



SANDY SPRINGS™
GEORGIA

Analysis of Impediments to Fair Housing

DRAFT

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Section	Page
1 Executive Summary of the Analysis.....	3
Introduction	8
CDBG Program & Analysis of Impediments to Fair Housing (AI)	8
Defining the AI.....	9
Fair Housing Act Overview	9
2 Jurisdictional Background Data.....	11
General Demographics.....	11
Employment Data.....	21
Housing Profile	23
Income Data	32
Maps and Other Relevant Data.....	37
3 Evaluation of Jurisdiction’s Current Fair Housing Legal Status	43
4 Identification of Impediments to Fair Housing Choice	44
Public Sector.....	44
Land use and Community Character-.....	46
Neighborhood Revitalization, Municipal and Other Services/Employment-Housing- Transportation Linkage	48
PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders.....	49
Sale of Subsidized Housing and Possible Displacement	57
Property Tax Policies	57
Planning and Zoning Boards.....	58
Building Codes (Accessibility).....	58
Private Sector	58
Lending Policies and Practices	59
Public and Private Sector	66
Fair Housing Enforcement.....	66
Informational Programs	67
5 Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction	68
6 Conclusions and Recommendations.....	70

SECTION I.

Executive Summary of the Analysis

Sandy Springs qualified as an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program in 2008. Cities and counties who participate in the CDBG Program assist HUD with its mission to ensure fair and equal housing opportunities for all. All HUD-funded entitlement communities are required by law to not discriminate in housing and services on the basis of race, color, religion, sex, national origin, age, familial status or disability. CDBG entitlement communities annually certify to promote fair housing in their communities. An Analysis of Impediments to Fair Housing (AI) helps to identify possible obstacles that may restrict or deny opportunities to freely select where a person or family wants to live, a right guaranteed by the Civil Rights Act of 1968. The Sandy Springs AI, developed by the staff of the Department of Community Development and is consistent with the Fair Housing Planning Guide published by HUD's Office of Fair Housing and Equal Opportunity (FHEO), contains a wide range of demographic, housing, loan origination and other data important to conducting a complete analysis. Participants in this analysis include the City of Sandy Springs, CDBG Consults, apartment complexes in Sandy Springs, The Fair Housing Division of Georgia Commission on Equal Opportunity (GCEO), and Metro Atlanta Fair Housing.

Like many jurisdictions in the Atlanta metro area, Sandy Springs experienced considerable development activity from 1980 through 2000 as described by Census data. Concurrent with this growth was a notable increase in the diversity of the city's population. For example, in 1990, Sandy Springs residents were 90 percent White; by 2000, that percentage had dropped to 78 percent, and by 2010, that percentage dropped to 65 percent. As of the time this report was written, the 2020 Census has not yet taken place to determine whether there have been any changes in the City's demographic composition. At this time, the City is in the early stages of developing an outreach plan to inform residents of the census, especially in those areas with historically and projected low response rates. The Census Day is expected to be on April 1, 2020. The 2013-2017 ACS 5-Year Estimates is the most recent data available currently, which shows slight changes in the City's racial composition compared to the 2010 Census.

As an unincorporated area of the Atlanta metropolitan region, Sandy Springs was subject to the planning and development policies of Fulton County until the City's incorporation on December 1, 2005. Fulton County approved a significant number of apartment developments in unincorporated Sandy Springs over the past 30 years. According to the 2000 Census, Sandy Springs had 42,744 housing units: 46 percent were owner-occupied units and 54 percent were renter-occupied units. The total number of housing units increased to 46,955 (including vacant units) in 2010. Out of the 42,334 occupied housing units, 48% were owner occupied and 52%

renter occupied.¹ In 2017, , the City had 49,302² total housing units: 46 percent were owner-occupied units and 54 percent were renter-occupied units.

An important aspect of an AI requires looking at areas of minority concentration in each CDBG entitlement community. With 24,201 occupied rental units, apartments offer the most accessible and affordable housing option in Sandy Springs where the median gross rent was \$1,154 in 2017. The median home value in 2017 was \$440,500 . Mapping residential data in Sandy Springs confirmed that minority and Hispanic/Latino residents are most concentrated in rental units along transit corridors; however, disabled residents are more widely disbursed throughout the city.

Analysis of development patterns is also a valuable element of an AI as it helps to assess whether residents may face restricted housing choices. In Sandy Springs, residential occupancy patterns for low- and moderate-income households can be directly linked to historical land use policies that located rental properties closest to public transit, retail opportunities and services. Consistent with these same policies, more affluent households had housing options less influenced by these factors.

The following information provided is based on rental data obtained through the City's CoStar Group subscription for the third quarter of 2019. The numbers provided below may change slightly every quarter, as it is real time data obtained by CoStar Group. There is a total of 85 apartment developments in the city. Approximately 55% of the apartment developments were built before 1989, 25% were built before 2000, and another 20% of the complexes were built between 2011 and 2017. Per the data from Q3 2019, the average rent was \$1,296 for a studio, \$1,245 for a 1-bedroom unit, \$1,470 for a 2-bedroom unit, \$1,782 for a 3-bedroom unit, and \$1,668 for a four-bedroom unit. There is a total of 283 studios, 10,560 total 1-bedroom apartment units, 11,506 2-bedroom units, 1,916 3-bedroom units, and 25 total 4-bedroom units. The total number of apartment units is approximately 24,330 across the total 85 apartment developments. The average number of apartment units for each apartment complex is 286.

The median gross rent, published by the 2013-2017 ACS 5-Year Estimates, for a 1-bedroom unit is 1,003, a 2-bedroom unit is 1,196, a 3-bedroom unit is 1,521, and 2,210 for a 4-bedroom unit. Based on the CoStar average rent data, 18 apartment complexes have average rents below the ACS median for 1-bedroom units, 16 apartment complexes below the ACS median for 2-bedroom units, 13 apartment complexes with rents below the ACS median rent for 3-bedroom units, and 2 apartment complexes have rents below the median for 4-bedroom units.

When analyzing the income needed to afford these rents based on the ACS median gross rent Census Data approximately 75 percent of households in Sandy Springs could afford these units using income distribution data from the 2013-2017 Census. However, when considering housing

¹ Census 2010, DP1: Profile of General Population and Housing Characteristics: 2010 Demographic Profile Data

² 2017, DP04: Selected Housing Characteristics, 2013-2017 American Community Survey 5-Years Estimate.

affordability for detached single-family housing, to afford the \$440,500 median priced house in Sandy Springs in 2017 required a gross monthly income of almost \$10,123.³

HUD's Fair Housing Planning Guide advises that an Analysis of Impediments to Fair Housing should also look at Home Mortgage Disclosure Act (HMDA) data to understand local mortgage lending patterns and its relevance to fair housing. Unfortunately, HMDA data are generally aggregated by Metropolitan Statistical Area (MSA), which presents an obstacle to developing a complete lending picture for a specific city. Mergers and online banking also make it more difficult to determine the depth of a local financial institution's lending activities. However, in some cases data was available for the Census Tracts that correspond to Sandy Springs. The results of this analysis can be found under Section V of the AI; however, for analysis at the MSA scale 2016 HMDA data illustrate a well-publicized fact that racial and ethnic minorities have lower loan approval rates than Whites in all mortgage loan categories. Fortunately, HMDA data provide information on the causes of denial, which can help to design strategies to address these historical lending disparities.

In conclusion, the preceding information represents a few of the highlights of the Sandy Springs AI. Maps, tables and other exhibits in the document have been used to more fully illustrate the referenced data, and evaluate the possible impediments to fair housing choice that might be present in Sandy Springs, which may include the following:

1. Potential of New Residents to be Aware of Fair Housing Laws.

While an historic Act in the history of civil rights legislation, Fair Housing law has been in place for over 40 years, and most citizens have only a general familiarity with the law, the protections it affords and how to file a fair housing complaint if they feel they have experienced discrimination.

Over the past decade the Sandy Springs minority population has grown considerably with the greatest increase seen in Hispanic/Latino residents. It would be safe to assume that all minority groups, especially those with potential language barriers, may be less informed concerning their rights under fair housing laws.

2. Lack of Available Land for New Development/Increased Redevelopment of Older, More Affordable Housing Stock with New, More Expensive Units.

Even though Sandy Springs has seen the redevelopment of two older apartment complexes, and the conversion of old underutilized retail properties into newer apartment buildings, there still remains a significant stock of affordable apartment units within the City. The City will need to continue to monitor the availability of affordable units and ensure that redevelopment does not deplete the City's affordable housing stock and that the existing affordable stock is preserved and protected.

3. Historical Disparities in Lending Across Racial and Ethnic Categories

³ Assumes a 30-year, 5% fixed interest rate mortgage with ratios of 28/36, 5% Down payment, 1.825 property tax and insurance costs as percent of home value

As part of HMDA data reporting, the reasons for loan denials must be included. For the Atlanta-Sandy Springs-Roswell MSA, debt-to-income ratio, employment history, credit history, and collateral were the four most common reasons cited for non-conventional loan denials. Denial rates were the highest primarily for minority borrowers due to debt-to-income ratios and credit history. This data would support that minorities are more likely to be denied loans for reasons other than discrimination.

Following HUD's Fair Housing Planning Guide, an AI should propose possible strategies for advancing fair housing and improving housing choices if impediments are identified. The general recommendation include the following:

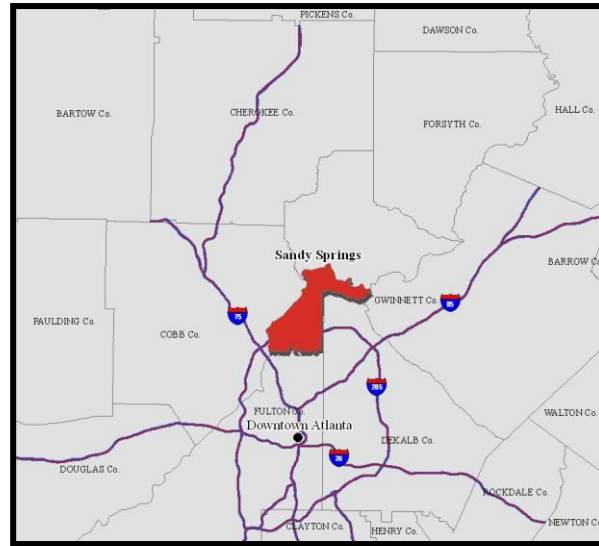
1. Continue to establish a fair housing information site using the Community Development Block Grant Program webpage. Make fair housing law, how to file a complaint and other information available on the website. References for locating Georgia Landlord/Tenant information could also be included.
2. Highlight fair housing activities during the National Fair Housing month by advertising on the City's website and newsletter educational and outreach activities hosted every April by the Atlanta Metro Fair Housing Services. Post on the City's website and newsletter information regarding Homebuyer Education Classes offered by Metro Fair Housing Services and DCA. (April is designated National Fair Housing Month each year by HUD)
3. Preserve partnerships with Sandy Springs Community Action Center (CAC) to ensure fair housing information is available for Hispanic/Latino residents. Consider partnerships with other nonprofit and faith-based organizations that serve minority residents in Sandy Springs to promote fair housing.
4. Provide fair housing information to Landlords and Property Managers when renewing business licenses.
5. Provide educational fair housing workshops once a year for residents of Sandy Springs' rental properties to discuss basic information on Fair Housing laws and agencies that are available for support if residents suspect they have experienced housing discrimination.
6. Host educational fair housing workshops on Fair Housing Laws once a year for housing providers.
7. Partner with Clearpoint, or other financial counseling nonprofit organization, to offer information on its services in Spanish and English on the City's Fair Housing website and Fair Housing Flyers since poor credit histories and other financial management issues have the greatest impact on minority loan denial rates according to HMDA data for the Atlanta-Sandy Springs-Roswell MSA.

8. Evaluate existing development projects that already have a mixed-income housing component to ensure compliance with adopted “Land Use Restriction Agreements.” Evaluate potential opportunities for new development to use the City’s incentives for Workforce Housing found in the Development Code.

Introduction

When the City of Sandy Springs, incorporated on December 1, 2005, it became Georgia's sixth largest city with a 2000 Census population of 85,781 residents. This figure represents an increase of 26% over a 1990 population of 67,842. The City's population as per the 2010 Census is 98,853. According to the 2013-2017 ACS 5-Year Estimates, the total population has increased to 103,703.

Exhibit II-1: Sandy Springs Location in Atlanta Metro Region



As with all cities with populations greater than 50,000, Sandy Springs can participate in the entitlement Community Development Block Grant (CDBG) Program in partnership with the U.S. Department of Housing and Urban Development (HUD). In 2008, Sandy Springs qualified as an entitlement community in the CDBG Program, which is one of the oldest and most established federal resources still available to local governments for assisting low- and moderate-income communities, eliminating slum and blight, and meeting urgent community needs. A variety of projects and programs can be funded with CDBG, including public facility, public service, infrastructure, economic development, housing rehabilitation and other projects.

CDBG Program & Analysis of Impediments to Fair Housing (AI)

To establish measurable outcomes and objectives for the CDBG Program, HUD requires that each city develop a 5-year Consolidated Plan that establishes both long-term and short-term goals for how CDBG funds will be used. Several annual certifications are also required as a condition of participation in the program. Specific to Fair Housing laws CDBG Program participants must certify that they have completed an Analysis of Impediments and are working to ensure fair housing choices in their communities. The purpose of the Analysis of Impediments to Fair Housing is to identify actions, omissions and decisions within each community that may restrict

a person's housing options. The AI should encompass all housing within the jurisdiction and not just the housing assisted or subsidized by the federal, state or local government.

Defining the AI

Impediments to fair housing choice are defined as actions, omissions or decisions that restrict housing choice or availability on the basis of race, color, religion, sex, disability, familial status, or national origin. Impediments may include policies, practices or procedures in the public or private sector that:

1. Constitute actual or potential violations of local, state and federal fair housing laws;
2. Are counterproductive to fair housing choice; and
3. Have the effect of restricting housing opportunities.

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An AI involves:

1. A comprehensive review of a State or Entitlement jurisdiction's laws, regulations and administrative policies, procedures and practices;
2. An assessment of how those laws, etc. affect the location, availability and accessibility of housing;
3. An assessment of conditions, both public and private, affecting fair housing choice for all protected classes; and
4. An assessment of the availability of affordable, accessible housing in a range of unit sizes.

Fair Housing Act Overview

President Lyndon Johnson signed the Civil Rights Act into law on April 11, 1968, one week after the assassination of Dr. Martin Luther King, Jr. Title VIII of the Civil Rights Act, commonly known as the Fair Housing Act, states:

"It is the policy of the United States to provide, within Constitutional limitations, for fair housing throughout the United States."⁴

The law directs all federal executive departments and federal agencies to administer their programs and activities related to housing and urban development in a manner to affirmatively further the purposes of the Act. The Fair Housing Act, as amended, prohibits discrimination in housing and housing related services on the basis of race, color, religion, sex, national origin, disability or familial status.

Prohibited acts of discrimination include but are not limited to:

1. Refusal to sell or rent housing;
2. Falsely denying the availability of housing;
3. Providing different terms, conditions or privileges for the sale or rental of a dwelling unit;

⁴ 42 U.S.C. Sec. 3601

4. Blockbusting, steering or redlining;
5. Denying access to or membership in a facility or service related to the sale or rental of housing;
6. Refusing to make a mortgage loan;
7. Refusing to provide information regarding the availability of loan products and services
8. Discriminating in appraising property; or
9. Setting different terms or conditions in the pricing of a loan product.

The Fair Housing Act was amended to include protections for disabled persons and families with children in 1988. It is unlawful to refuse to make reasonable accommodations in rules, policies, practices or services if such an accommodation is necessary for a disabled person to use the housing. Furthermore, landlords must allow reasonable modifications to a dwelling or to common use areas, if necessary for the disabled person to use the housing, specifically ensuring that all doors and hallways are an acceptable width for wheelchairs. Multifamily dwellings that have four or more units that were ready for first occupancy after March 31, 1991, are covered by the Fair Housing Act, which requires that all ground floor units must have:

1. An accessible route into and through the unit;
2. Accessible light switches, electrical outlets, thermostats and other environmental controls;
3. Reinforced bathroom walls to allow later installation of grab bars; and
4. Kitchens and bathrooms useable by persons in wheelchairs.

Section II.

Jurisdictional Background Data

Sandy Springs has a notable history in the Atlanta metro area in that for over thirty years, residents of this unincorporated area sought to form a city and divest themselves of governance by Fulton County. On June 21, 2005, 94 percent of the residents of Sandy Springs voted affirmatively for incorporation. On December 1, 2005, Sandy Springs became the first new municipality in Georgia in over 30 years.

General Demographics

The demographic data presented in Section II is largely taken from 2010 available through the U.S. Bureau of the Census. Where available and relevant, more recent data from the American Community Survey (ACS) has been included for comparison to the 2010 Census data. It is important to note, however, that ACS data are estimates based on sampling and not the result of analysis conducted on actual survey data from the decennial Census. In light of this, the changes evidenced through comparing 2010 Census to ACS data for Sandy Springs can be informative as it illustrates population, housing, income and other demographic shifts that may (or may not) appear following the 2020 Census. In general, Section II offers an overview of population, housing, income and other characteristics that may have relevance to identifying impediments to fair housing.

Population

The city of Sandy Springs, incorporated December 1, 2005, is Georgia's sixth largest city with a 2010 Census population of 98,853 residents. This figure represents an increase of 15% over the 2000 population of 85,781. The most recent 2017 ACS 5-Year Estimates, set the total population at 103,703, which is a 5% increase from 2010 and a 20% increase from 2000. Exhibit III-1 reflects general population data for the city in comparison to other neighboring jurisdictions in Fulton County. The general population across the jurisdictions have increased no more than 10% per city in North Fulton County when comparing the 2010 census data and the 2017 ACS 5-year estimates data.

Exhibit III-1: General Population for Atlanta and North Fulton Cities⁵

Jurisdiction	Population 2010 ACS	Population 2013-2017 ACS 5-year Estimate
Atlanta	420,003	465,230
Sandy Springs	98,853	103,703
Roswell	88,346	94,239
Johns Creek	77,728	83,397
Alpharetta	57,551	63,929
Milton	32,662	37,556
Mountain Park	547	698

Race and Ethnicity

Sandy Springs has seen the same shifts in racial and ethnic composition as the rest of the Atlanta region over the past decade: it has become less White and more diverse. The fastest growing demographic segment over that period has been the increased residency of Hispanic/Latino persons. This population in Sandy Springs increased from 10 percent in 2000 to 14 percent in 2010, and the White population decreased from 78 percent to 65 percent. Exhibit III-2 illustrates general race and ethnicity data for Sandy Springs, the city of Atlanta and Fulton County. Once the 2020 Census is conducted, we can determine if the increase trend in diversity continues to occur in Sandy Springs and across the region.

⁵ All cities' populations reflect the 2010 decennial Census and the 2017 ACS 5-year Estimate.

Exhibit III-2: 2010 Census Race and Ethnicity⁶

Race/Ethnicity	Sandy Springs	City of Atlanta	Fulton County
White	67.1%	39.7%	46.1%
Black/African American	21.3%	55.2%	45.3%
American Indian & Alaska Native	.8%	.8%	.8%
Asian	5.8%	3.8%	6.3%
Native Hawaiian/Other Pacific Islander	.2%	.1%	.1%
Some Other Race	7.8%	2.6%	3.9%

*Hispanic or Latino are included in each race/ethnicity

⁶ Census 2010, QT-P6: Race Alone or in Combination and Hispanic or Latino: Census Summary File 1

Exhibit III-3: Sandy Springs 2000 Racial Distribution⁷

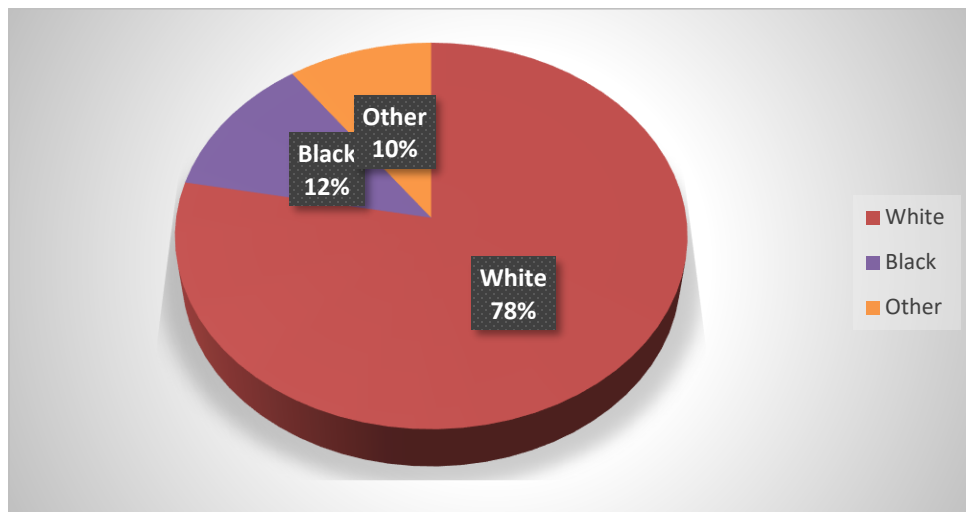
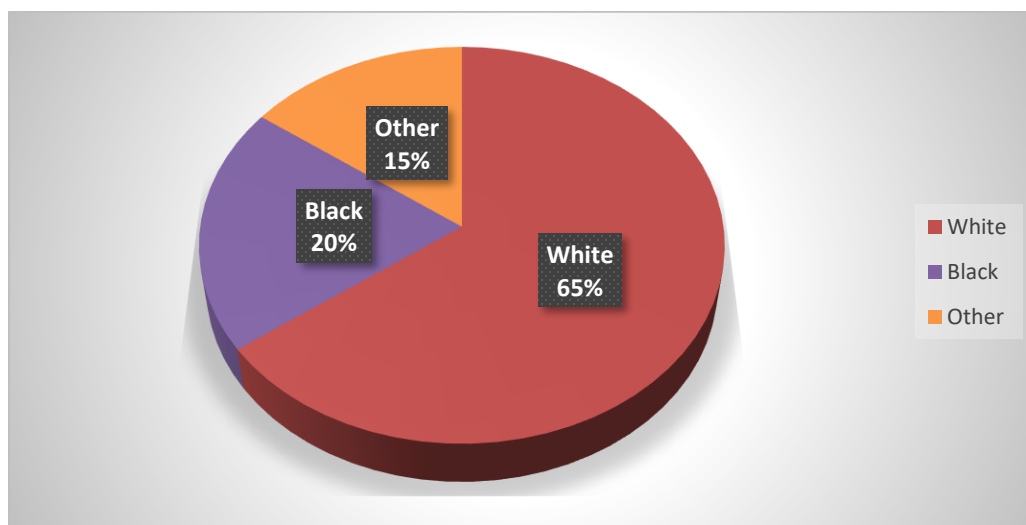


Exhibit III-3: Sandy Springs 2010 Racial Distribution⁸



Racial and Ethnic Concentrations

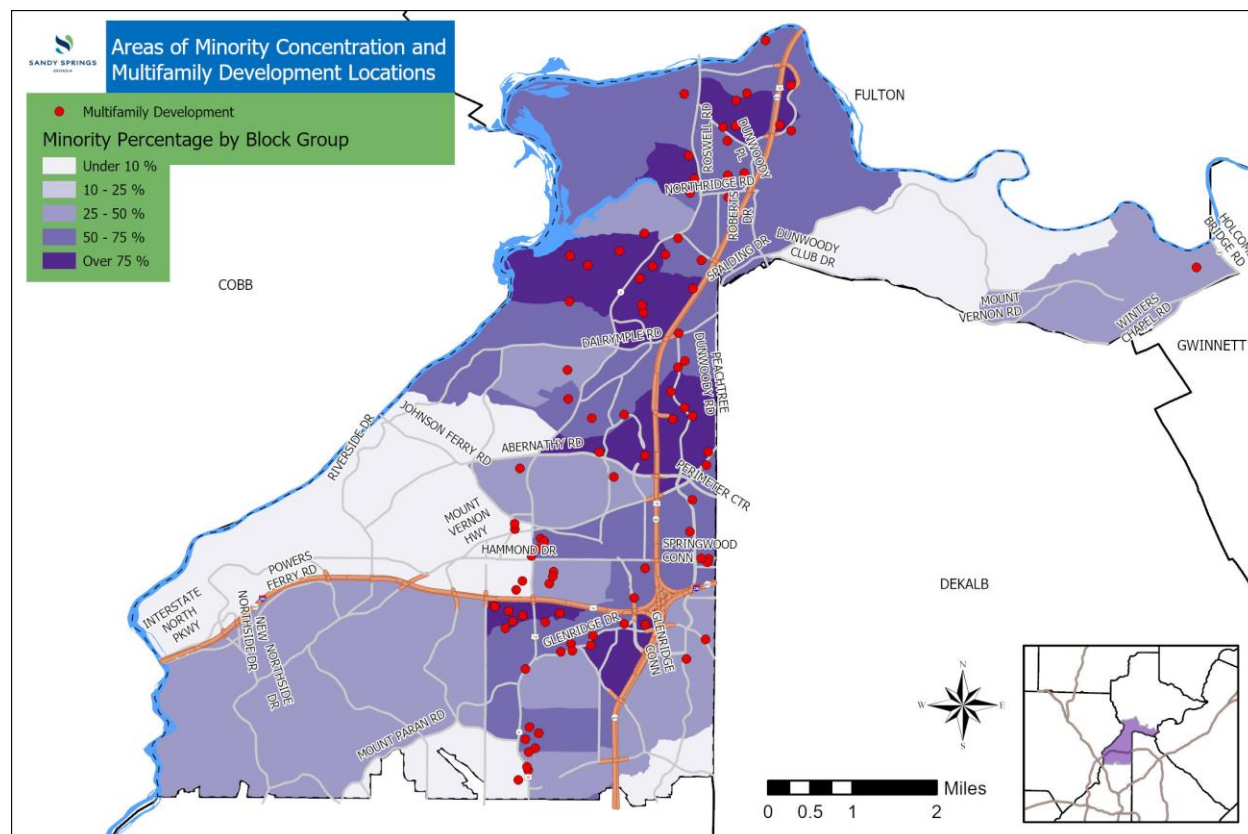
One of the key aspects of an AI is the identification of areas of minority concentration as an approach to analyzing ordinances and policies, and the resulting development patterns that may account for areas of minority concentration. However, where a person chooses to live often reflects multiple influencing factors: proximity to family and friends; access to employment, retail services or recreation; housing type, affordability, overall neighborhood perception and other factors. Exhibit III-4 illustrates areas of minority concentration in Sandy Springs using 2013-2017 ACS, 5-Year Estimates. The map shows the Census block groups where minority residents lived,

⁷ U.S. Census Bureau, 1990 STF-1, 100-percent data file

⁸ U.S. Census Bureau, 2010 STF-1, 100-percent data file

and includes the locations of apartment developments, which evidences that minority residents were most likely to live in multifamily properties in Sandy Springs rather than own a home. This is likely more a reflection of historical land use policies, income disparities between racial and ethnic groups and the availability of affordable single-family homes than evidence of minority populations being steered or discouraged from living in other areas of the city. Apartments in Sandy Springs are also the most reasonably priced housing with accessible bus and rail service linked to employments centers in north Fulton and the Atlanta metro region.

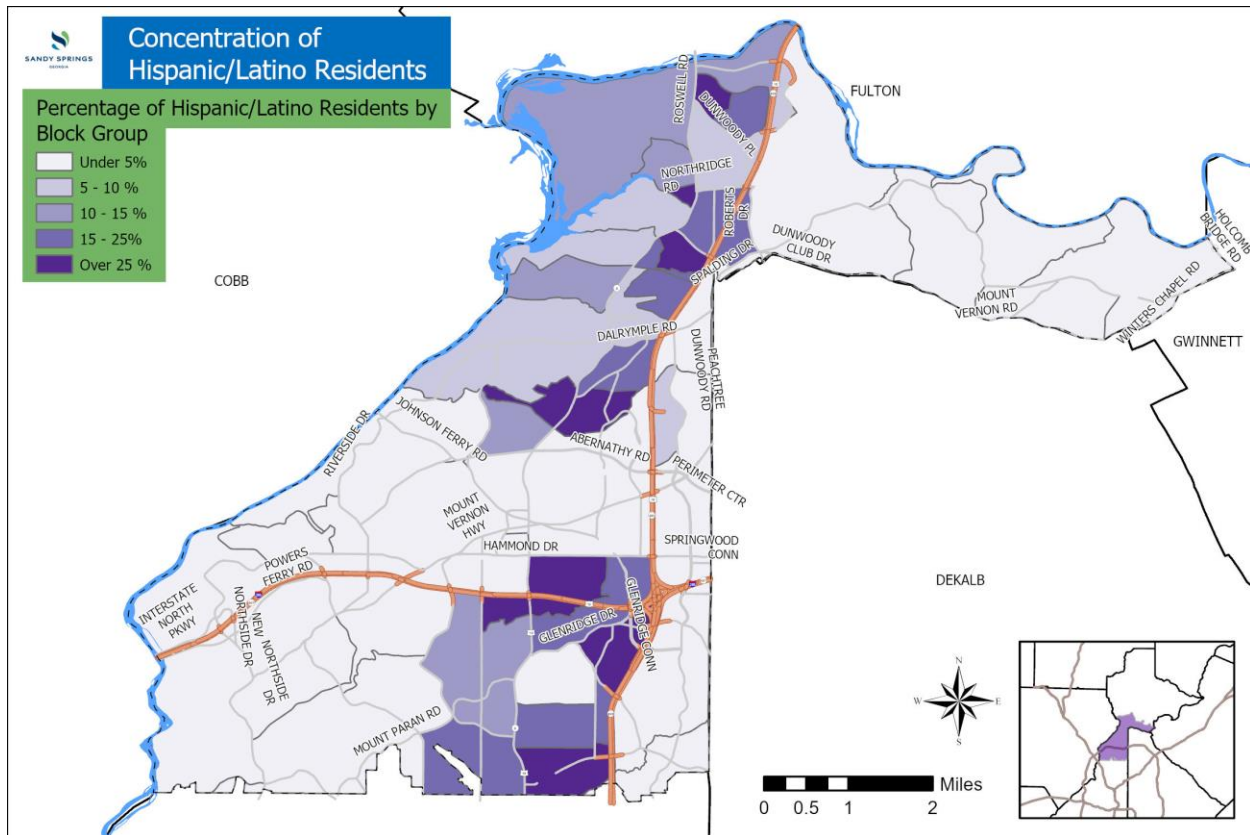
Exhibit III-4: Areas of Minority Concentration⁹ and Multifamily Development Locations



⁹ 2017, ACS 5-Year Estimates

To further evaluate the distribution of minority residents in Sandy Springs, Exhibit III-5 illustrates the concentration of Hispanic/Latino residents using 2017 ACS, 5-Year Estimates block group data.

Exhibit III-5: Concentration of Hispanic/Latino Residents by Block Group¹⁰

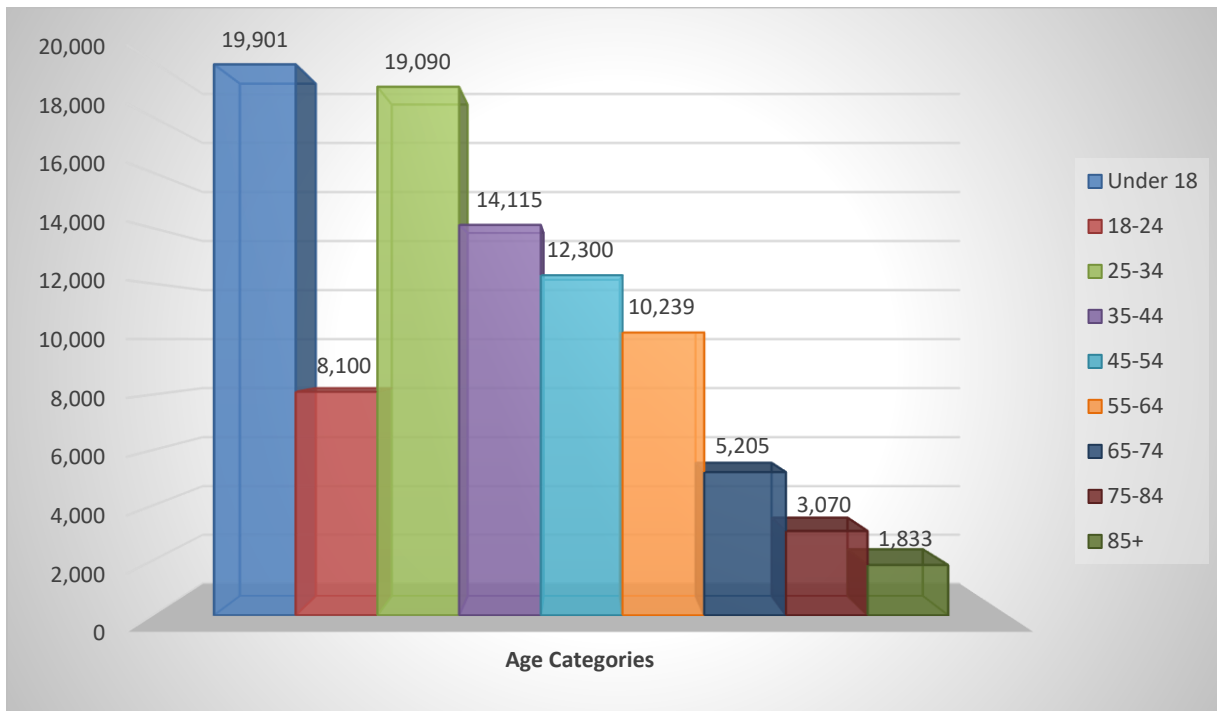


¹⁰ 2017, ACS 5-Year Estimates

Gender and Age Distribution

Using 2010 Census data, Sandy Springs residents were 48 percent female and 52 percent male. The largest age cohort was the under 18 residents, making up 21 percent of the city's population, followed closely by the under 25 to 34 year old age group at 20 percent of the population. The American Community Survey (ACS) for 2017 estimates a small decline in the 1 to 4 and the 20 to 24 year old categories. The ACS also estimates a significant increase in the 65 to 74 and 60 to 64 categories. Only the 2020 Census will provide evidence as to whether these predictions will hold true for Sandy Springs. Exhibit III-6 shows these estimated trends.

Exhibit III-6: 2010 Census Sandy Springs Population by Age ¹¹



¹¹ Census 2010, QT-P1, Age Groups and Sex: 2010

Exhibit III-7: Sandy Springs Estimated Aging Trends¹²

Age Cohort	Census 2010	ACS 2017 Estimates	% Change
1-4 years	6,351	6,249	-2%
5-9 years	5,598	5,712	2%
10-14 years	5,025	5,861	16%
15-19 years	4,582	5,317	16%
20-24 years	6,445	6,306	-2%
25-34 years	19,090	20,462	7%
35-44 years	14,115	15,661	10%
45-54 years	12,300	13,450	9%
55-59 years	5,350	6,276 ,	17%
60-64 years	4,889	5,767	18%
65-74 years	5,205	7,364	41%
75-84 years	3,070	3,529	14%
85 and above	1,833	1,749	-4%

¹² Census 2010, QT-P1: Age Groups and Sex: 2010, 2010 Census File Summary File 1; DP05: ACS Demographic and Housing Estimates 2013-2017 ACS 5-Year Estimates

Persons with Disabilities

The 2017 ACS reported that 6,775¹³ residents, or 7 percent of the city's population, were disabled. Data on disability status comes from two questions included in the 2010 Census related to long-lasting conditions designed to capture the extent of a person's disability. The US Census Bureau asks three questions¹⁴ about disability to identify limitations in basic areas of functioning and independent living. The first question asks the respondents about the presence of hearing, blindness or severe vision difficulties. The second question asks the respondents to identify lack of concentration, remembering, or making decisions due to physical, mental or emotional conditions, as well as difficulty walking or climbing stairs, dressing or bathing. The third question asks if the individual has difficulty doing errands alone such as visiting a doctor's office due to a physical, mental, or emotional condition. The questionnaire cover six disability types:

- **Hearing difficulty** deaf or having serious difficulty hearing.
- **Vision difficulty** blind or having serious difficulty seeing, even when wearing glasses.
- **Cognitive difficulty** because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions.
- **Ambulatory difficulty** having serious difficulty walking or climbing stairs.
- **Self-care difficulty** having difficulty bathing or dressing
- **Independent living difficulty** Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping.

Respondents who report any one of the six disability types are considered to have a disability. Exhibit III-8 shows the types of disabilities present in Sandy Springs: .

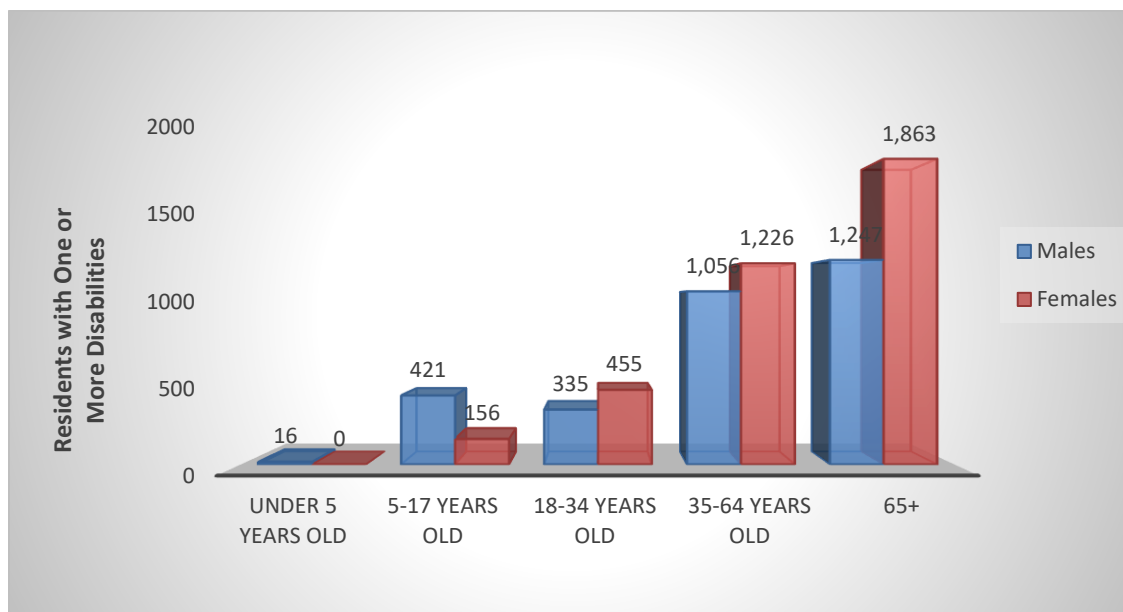
¹³ 2017 S1810, Disability Characteristics, 2017 ACS 5-Year Estimates

¹⁴ US Census Bureau. (n.d) American Community Survey: Why we ask questions about disability. Retrieved from <https://www.census.gov/acs/www/about/why-we-ask-each-question/disability/>

Exhibit III-8: Disability by Type¹⁵

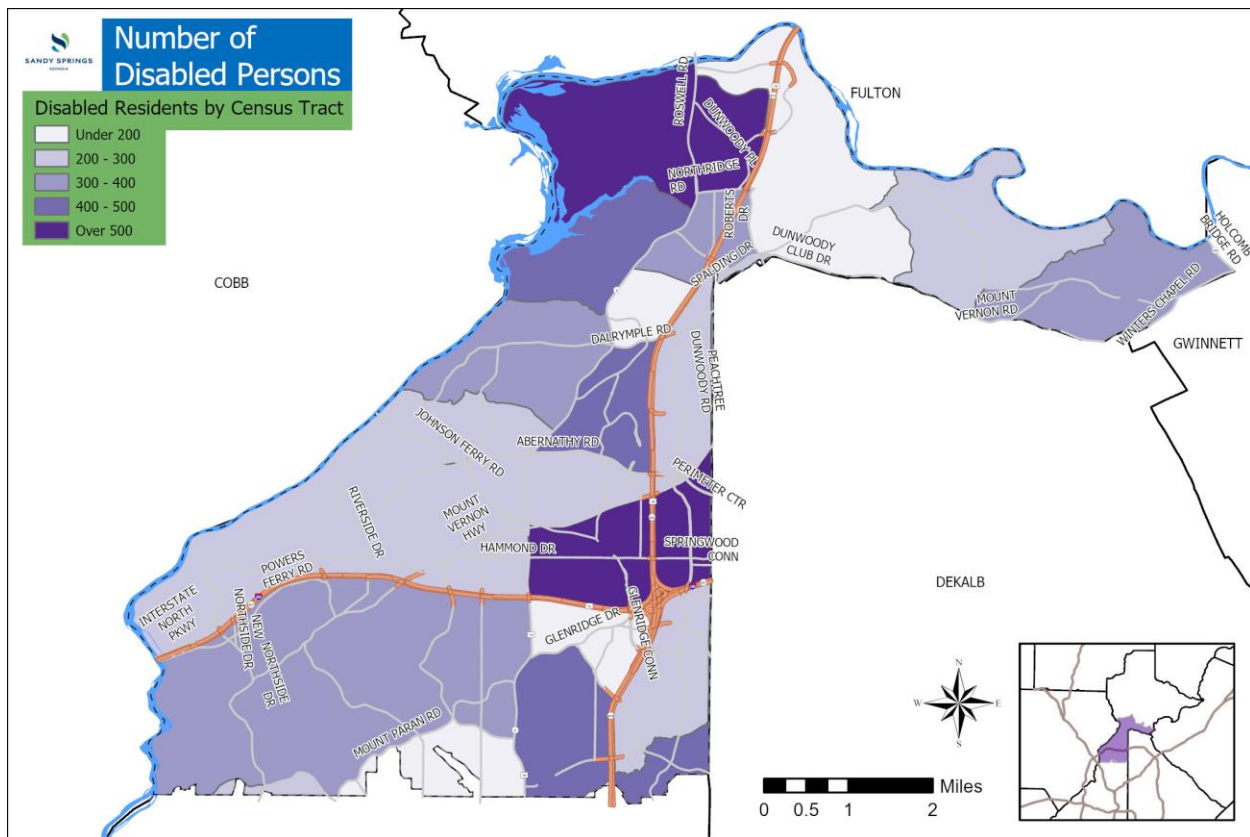
Disability	Total	Percent of Population
Hearing	2,007	1.9%
Vision	1,187	1.1%
Cognitive	2,444	2.5%
Ambulatory	3,194	3.3%
Self-care	1,325	1.4%
Independent Living	2,694	3.3%

Exhibit III-9: Total Disabilities by Gender and Age



¹⁵ 2013-2017 ACS 5-year estimates; S1810: Disability Characteristics, 2013-2017 ACS 5-year estimates; B18101: Sex by Age by Disability Status Universe: Civilian noninstitutionalized population.

Exhibit III-10: Disabled Residents by Census Tract¹⁶



Employment Data

Sandy Springs is located in the north-central area of the Atlanta metro region, which provides the city with significant location advantages, including a substantial share of the region's employment growth - growth that has occurred without the adoption of aggressive economic development policies. The presence of major transportation corridors such as I-285, GA 400 and State Route 9 (Roswell Road) has provided a significant framework for development and redevelopment within those corridors as transportation and jobs have critical linkages. Sandy Springs also benefits from the presence of three MARTA rail stations that provide transportation options for those who work within Sandy Springs employment centers, as well as those who commute to these centers from other areas of the region.

The Economic Outlook Chapter of the Next Ten Comprehensive Plan notes that Sandy Springs has a large percentage of financial, professional and health employment, as compared to the region. Sandy Springs is a top office submarket for the region, especially for headquarters, finance and insurance industries, and other professional industries. It is also home to a regional medical hub. In terms of future employment, Sandy Springs is anticipated to experience growth in

¹⁶ Census 2017, ACS 5-Year Estimates

professional level, high-income jobs. These types of jobs are consistent with an economic climate and development patterns that emphasize office parks instead of industrial parks. Only a small portion of the jobs in the Sandy Springs area are in construction, manufacturing, and hospitality. The Next Ten Comprehensive Plan also articulates the City's desire to retain this white-collar employment focus and adopt a zoning ordinance and land use policies that support this perspective. The priority actions for Economic Development on the Next Ten Comprehensive Plan consists of attracting and retaining major employers, recruit and support new business, and promote a greater mix of uses in selected redevelopment areas. The size and scale of the Perimeter Center Improvement District (PCID) also supports this development strategy. According to the 2013-2017 ACS 5-year estimates, 73 percent of the population 16 years and over in Sandy Springs were in the labor force, and 70% percent were employed. The following are the three main occupational classifications:

1. Management, professional and related occupations
2. Service occupations
3. Sales and office occupations

The specific industry sectors with the largest employment are illustrated in Exhibit III-11.

Exhibit III-11: 2008 Sandy Springs ACS Estimates of Industry Sectors¹⁷

Industry	Number	Percent
Agriculture, forestry, fishing and hunting, and mining	223	0.4%
Construction	2,243	3.8%
Manufacturing	2,810	4.7%
Wholesale trade	1,534	2.6%
Retail trade	5,406	9.1%
Transportation, warehousing and utilities	1,652	2.8%
Information	2,916	4.9%
Finance and insurance, real estate and rental and leasing	6,732	11.3%

¹⁷ 2017, DP03: Selected Economic Characteristics, 2013-2017 American Community Survey 5-Year Estimates

Professional, scientific, and management, and administrative and waste management services	14,064	23.7%
Educational services, and health care and social assistance	10,596	17.8%
Arts, entertainment, and recreation, and accommodation, and food service	7,121	12%
Other services, except public administration	3,096	5.2
Public administration	1,044	1.8%

Transportation

The 2013-2017 ACS data indicate that over 80 percent¹⁸ of Sandy Springs residents commuted to work using a car, truck or van, and that 73 percent did so alone. Less than 9 percent used public transportation.

Housing Profile

According to the 2013-2017 ACS 5-Year Estimates, there were 49,302 housing units in Sandy Springs. Forty-six percent were owner-occupied units and 54 percent were renter-occupied units. Exhibit III-12 shows housing data for the 2000 and 2010 Census for Sandy Springs, Atlanta, Fulton County and Georgia.

Exhibit III-12: Housing Units by Tenure¹⁹

Jurisdiction	2000 Percent Owner- occupied	2010 Percent Owner- occupied	2000 Percent Renter- occupied	2010 Percent Renter- occupied
Sandy Springs	46%	45%	54%	55%

¹⁸ 2017, B08301, , Means of Transportation to Work Universe: Workers 16 years and over, 2013-2017 ACS 5-Year Estimates.

¹⁹ Census 2000 and 2010: General Housing Characteristics, 2000 and 2010 ACS Survey.

Atlanta	44%	43%	57%	57%
Fulton	52%	52%	50%	48%
Georgia	67%	63%	35%	37%

Since its incorporation, the question of an ideal target mix of single-family and multifamily units has been the subject of discussion by the city. The city's position has been that the higher percentage of rental housing units provides an adequate supply of affordable housing for those who wish to live in Sandy Springs. Exhibit III-12 shows that over the past decade the percentage of owner-occupied units has declined and the number of rental units has increased in Sandy Springs while the percentage of owner-occupied units has slightly increased in other jurisdictions and the state. The 2020 Census will determine if this trend persists today.

In 2017, 44,919 housing units in Sandy Springs were occupied. The remaining 4,383 were vacant. Vacancy rates are shown in Exhibit III-13.

Exhibit III-13: 2010 Census Vacancy Rates by Jurisdiction²⁰

Jurisdiction	Percent Units Vacant
Sandy Springs	9%
Atlanta	19%
Fulton	14%
Georgia	14%

Cost of Housing

According to the 2013-2015 ACS 5-Year Estimates, the median home value in Sandy Springs was \$440,500 and the median rent was \$1,154. Exhibit III-14 below provides monthly contract rents for rental units and median home values in Sandy Springs.

²⁰ 2017, DP04, Selected Housing Characteristics: 2013-2017 American Community Survey 5-Years Estimates.

Exhibit III-14: Monthly Rents and Home Values²¹

Home Value	2013-2017 ACS 5-Year Estimates	Monthly Rent	2013-2017 ACS 5-Year Estimates
0\$ to \$99,999	8%	Less than \$500	2.4%
\$100,000 to \$149,999	9%	\$500 to \$999	29%
\$150,000 to \$199,999	6%	\$1,000 to \$1,499	51.6%
\$200,000 to \$299,999	8%	\$1,500 to \$1,999	13.2%
\$300,000 to \$499,999	27%	\$2,000 to \$2,499	1.1%
\$500,000 to \$999,999	31%	\$2,500 to \$2,999	1.1%
\$1,000,000 or more	10.4%	\$3,000 or more	\$1.5
Median	\$440,500	Median	\$1,154

Exhibit III-15: Median Housing Values²²

²¹ 2017, DP04, Selected Housing Characteristics: 2013-2017 American Community Survey 5-Years Estimates.

²² 2017, DP04, Selected Housing Characteristics: 2013-2017 American Community Survey 5-Years Estimates

Sandy Springs	City of Atlanta	Fulton County	Georgia
\$440,500	\$238,00	\$268,900	\$158,400

According to the 2017 ACS, 68 percent of the homes in Sandy Springs had a value of \$300,000 or more; 2,155 of those units had values of \$1,000,000 or more. Approximately less than 30% of the total units had a monthly rent of less than \$999. More than half of the rental units had rents greater than \$1,000 a month; almost 16,400 of those units had rents greater than \$1,000 a month. To afford a rental unit in Sandy Springs at the \$1,154 median rent, a household would need a minimum income of \$46,152²³ It's also important to note that an annual salary of almost \$46,000 requires a pay rate of approximately \$24/hour. When considering housing affordability for detached single-family housing, to afford the median house in Sandy Springs in 2017 (\$440,500 required a gross monthly income of almost \$10,123.²⁴

Public Housing

The Housing Authority of Fulton County (HAFC) was the public housing agency for the unincorporated areas of Fulton County prior to the City's incorporation on December 1, 2005. The HAFC owns a hundred-unit building, called Sterling Place, located at 144 Allen Road, which serves the elderly and disabled who meet the income eligibility requirement guidelines. The HAFC converted its public housing property to the Project Based Voucher and Rental Assistance Demonstration (RAD) Program in 2013. The property was renovated in 2016. The HAFC administers 108 Housing Choice Vouchers (formerly Section 8) within the City of Sandy Springs. The City maintains an ongoing relationship with the HAFC.

The HAFC also provided bond financing to private housing developers to construct approximately 600 units of mixed-income, multifamily housing in the early 1990s. Each development below has a percentage of set-aside units for those who meet the income and eligibility requirements of public housing programs, along with market rate units. However, for the majority of these properties, the qualified period has expired. Those properties are:

- Commons at Victoria Park (32% affordable units). The Qualified Period is unclear for this property.
- Monterey (26% affordable units), now called Edgewater at Sandy Springs Apartments. Qualified Project Period has ended.

²³ Assumes HUD's calculation of not more than 30 percent of a household's income should go toward housing costs per month

²⁴ Assumes a 30-year, 5% fixed interest rate mortgage with ratios of 28/36, 5% Downpayment, 1.825 property tax and insurance costs as percent of home value

- Hampton Hill (39% affordable units), now called The Hamptons at Sandy Springs. Qualified Project Period has ended.
- Walton Falls Apartments (11% affordable units), now called the Adair Apartments. Qualified Project Period has ended.
- Spring Creek Apartments (20% affordable units), now called Lyon Jasmine at Sandy Springs. Qualified Project Period has ended.
- Provence North (36% affordable units). The Qualified Period is unclear for this property.

Age of Housing Stock

Exhibit III-17 shows housing units in Sandy Springs by the year in which they were built. Fifteen percent of Sandy Springs' owner-occupied units are over 50 years old. Forty-seven percent of owner-occupied homes were built before 1979, the year in which lead was banned from paint. Thirty-five percent of rental units were built before 1979. That is almost 18,500 housing units in Sandy Springs contain lead-based paint.

Exhibit III-17: Distribution of Housing Units by Year Built²⁵

Year Structure Built	Owner-occupied	Percent	Renter-occupied	Percent
2014 or later	160	0.8%	355	1.5%
2010 to 2013	507	2.4%	328	1.4%
2000 to 2009	2,997	14.5%	1,356	5.6%
1980 to 1999	7,177	34.6%	13,528	55.9%

²⁵ 2017, S2504: Physical Housing Characteristics For Occupied Housing, 2013-2017 American Community Survey 5-Year Estimates.

1960 to 1979	8,099	39.1%	7,815	32.3%
1940 to 1959	1,618	7.8%	770	3.2%
1939 or earlier	160	0.8%	49	0.2%
Total	20,718	100%	24,201	100%

Housing Units in Severely Substandard Condition

Data from the 2017 Census in Exhibit III-18 shows the number of Sandy Springs housing units without complete plumbing or kitchen facilities.

Exhibit III-18: Substandard Living Conditions²⁶

Substandard Facilities	Number of Units	Percent of Units
Owner-occupied units	20,718	100.0%
Lacking complete plumbing	52	0.2%
Lacking complete kitchen	106	0.5%
Renter-occupied units	24,153	100.0%
Lacking complete plumbing	48	0.1%
Lacking complete kitchen	246	1%

²⁶ 2017, B25053: Tenure by Kitchen Facilities, Occupied Housing Units, 2013-2017 ACS 5-Year Estimates; B25049: Tenure Plumbing Facilities Universe, Occupied Housing Units, 2013-2017 ACS 5-Year Estimates

Census data reveals that only a handful of owner-occupied and rental units were substandard in Sandy Springs in 2017.

Households

In 2000, Sandy Springs had 39,288 households. The 2010 Census showed that number had increased by 3,046 to 42,334, or approximately 7% in a decade. The American Community Survey (ACS) for 2017 shows the household population increased by 2,585. Household data is shown in Exhibit III-19 below.

Exhibit III-19: Sandy Springs Households²⁷

Jurisdiction	2000 Census	2010 Census	2017 ACS Estimate
Sandy Springs	39,288	42,334	44,919
City of Atlanta	168,147	185,142	192,929
Fulton County	321,242	376,377	391,850

Familial Status

The Fair Housing Act protects families from discrimination in housing choice; therefore, an AI should examine familial status and large households in the context of a broader fair housing analysis. In 2017, only 16 percent of households in Sandy Springs had people 18 years old or under in the home. Of the households with people under 18 years old, 70 percent were married-couple families, 9 percent were male-headed households and 21 percent were female-headed households as illustrated by Exhibit III-20.

²⁷ 2017, B11005: Households by Presence of People Under 18 Years by Household Type Universe: Households, 2013-2017 ACS 5-Year Estimates

Exhibit III-20: Households by Type²⁸

Household Type	Number	Percent
<i>Households with one or more people under 18 years</i>	10,914	16%
Married-couple family	7,604	70%
Male-headed households	1,023	9%
Female-headed households	2,252	21%
<i>Households with no people under 18 years</i>	34,005	49%
Married couple family	10,934	32%
Male-headed household	774	2%
Female-headed household	1,385	4%
<i>Total households</i>	68,891	100%

In Sandy Springs, the average owner occupied household size was 2.41 persons, which was the second smallest household size after the City of Atlanta. . In Sandy Springs, the renter occupied household size is smaller than the owner occupied housing size and it is the second smallest after the City of Atlanta.

²⁸ 2017, B11005: Households by Presence of People Under 18 Years by Household Type Universe: Households, 2013-2017 ACS 5-Year Estimates

Exhibit III-21: Average Household Size by Tenure²⁹

Jurisdiction	Owners	Renters
Sandy Springs	2.41	2.20
City of Atlanta	2.36	2.15
Fulton County	2.65	2.32
Georgia	2.75	2.63

Large households are defined by the Census as having five or more persons in a household. According to the 2017 ACS Estimates, there were 2,398 occupied households (owner-occupied and renter) in Sandy Springs with 5 or more persons, or 5 percent of the total households in the city. Exhibit III-22 shows owner-occupied and rental households with 5 or greater residents.

Exhibit III-22: Households with Five or More Occupants by Tenure³⁰

Jurisdiction	Owned Units with 5+ Occupants	Percent of Households	Rental Units with 5+ Occupants	Percent of Households
Sandy Springs	1,123	5%	1,275	5%
City of Atlanta	4,495	5%	4,305	5%
Fulton County	15,129	7%	11,389	6%
Georgia	223,038	10%	139,443	10%

²⁹ 2017, CP04, Comparative Housing Characteristics, 2013-2017 ACS Survey 5-Year Estimates

³⁰ 2017, B25009: Tenure by Household Size Universe: Occupied Housing Units, 2013-2017 ACS 5-Years Estimates.

Income Data

Household Income

The 2000 Census reported the median household income for Sandy Springs at \$60,428, increasing to \$69,492 in 2006, or 6 percent over a six-year period. The 2017 Census estimates the median household income as \$70,920 for Sandy Springs, \$51,702 for the City of Atlanta, \$61,336 for Fulton County, \$52,977 for Georgia.³¹ Median household incomes for Sandy Springs and surrounding jurisdictions per the 2000 and 2010 Census are shown in Exhibit III-23.

Exhibit III-23: Household Median Incomes³²

Jurisdiction	2000 Median Income	2010 Median Income	Percent Change
Sandy Springs	\$60,428	\$59,110	-2%
City of Atlanta	\$34,770	\$41,631	20%
Fulton County	\$47,321	\$52,831	12%
Georgia	\$42,433	\$46,430	9%

The U.S. Department of Housing and Urban Development also provides median household incomes for selected Metropolitan Statistical Areas (MSAs) that are used to qualify participants for community development, housing and other programs. Sandy Springs is part of the Atlanta-Sandy Springs-Roswell MSA, the median family income is \$79,700 in 2019.

³¹ 2017, DP03: Selected Economic Characteristics, 2013-2017 ACS Survey, 5 Year Estimates.

³² Census 2000, QT-P32: Income Distribution in 1999 of Households and Families, 2010; DP03: Selected Economic Characteristics.

Exhibit III-24: Income Distribution for All Households³³

Income Range	Households	Percent
Less than \$10,000	1,909	4%
\$10,000 to \$14,999	1,577	3.5%
\$15,000 to \$19,999	1,272	2.8%
\$20,000 to \$24,999	1,932	4.3%
\$25,000 to \$29,999	1,679	4%
\$30,000 to \$34,999	1,794	4%
\$35,000 to \$39,999	1,782	4%
\$40,000 to \$44,999	2,419	5%
\$45,000 to \$49,999	1,384	3%
\$50,000 to \$59,999	3,298	7%
\$60,000 to \$74,999	4,907	11%
\$75,000 to \$99,999	4,413	10%
\$100,000 to \$124,999	3,617	8%
\$125,999 to \$149,999	2,575	6%
\$150,000 to \$199,999	3,129	7%
\$200,000 or more	7,232	16%
Total	44,919	100.0%

³³ 2017, B19001: Household Income in the Past 12 Months (in 2017 Inflation-Adjusted Dollars) Universe: Households, 2017 ACS 5-Year Estimates

As shown in Exhibit III-24, fifteen percent of Sandy Springs households made less than \$24,999 a year, twenty percent made between \$25,000 and \$49,000, and twenty-eight percent made between \$50,000 and \$99,999, and thirty-six percent made more than \$100,000 in 2017.

Households in Poverty

The federal government establishes the poverty rate and updates that figure annually with adjustments for household size. In 2000, the poverty rate for a family of four was \$17,603. The U.S Census Bureau determines the poverty thresholds by size of family and number of related children under 18 years old. In 2017, the poverty threshold was \$25,094 for a family of four. In 2017, 11percent of Sandy Springs population, or 11,628 residents, lived below the poverty threshold. Exhibit III-25 provides the data on poverty by age group.

Exhibit III-25: Poverty by Age³⁴

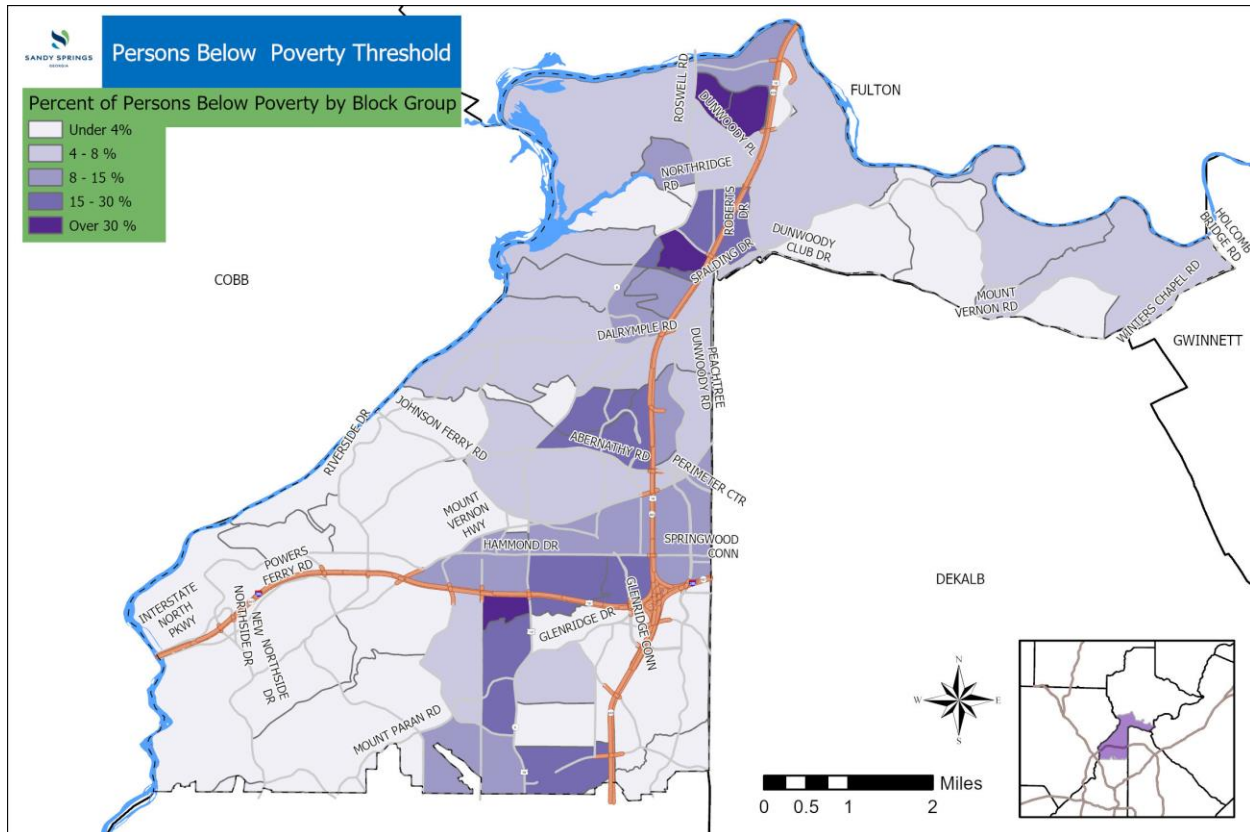
Age	In Poverty	Not in Poverty	Total	% in Poverty in Age Group
Under 5 years	1,272	4,951	6,223	20%
5 years	401	832	1,233	32%
6 to 11 years	1,456	4,977	6,433	22%
12 to 17 years	1,293	6,149	7,442	17%
18 to 64 years	6,615	63,183	69,798	9%
65 to 74 years	201	7,107	7,308	3%

³⁴ 2017:, B17001: Poverty Status in the Past 12 Months by Sex by Age Universe: Population for whom poverty status is determined, 2013-2017 ACS 5-Year Estimates

75 years and over	559	4,550	5,109	11%
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Exhibit III-26 maps this data showing the distribution of individuals living below the poverty threshold in Sandy Springs in 2017.

Exhibit III-26: Persons below Poverty Threshold by Census Block Group³⁵

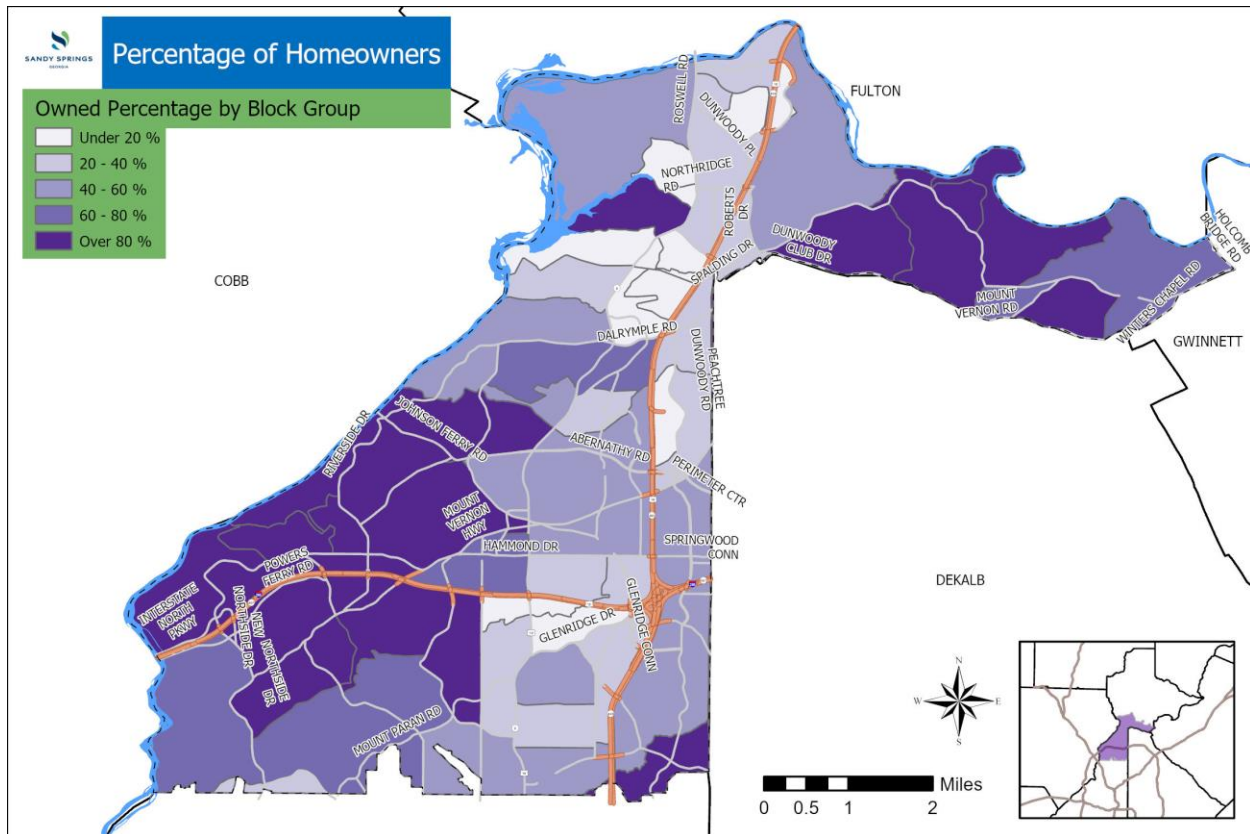


³⁵ 2017, ACS 5-Year Estimates

Maps and Other Relevant Data

To further evaluate the distribution of the housing profile in Sandy Springs, Exhibit III-27 illustrates the percentage of homeowners using 2017 ACS, 5-Year Estimates block group data.

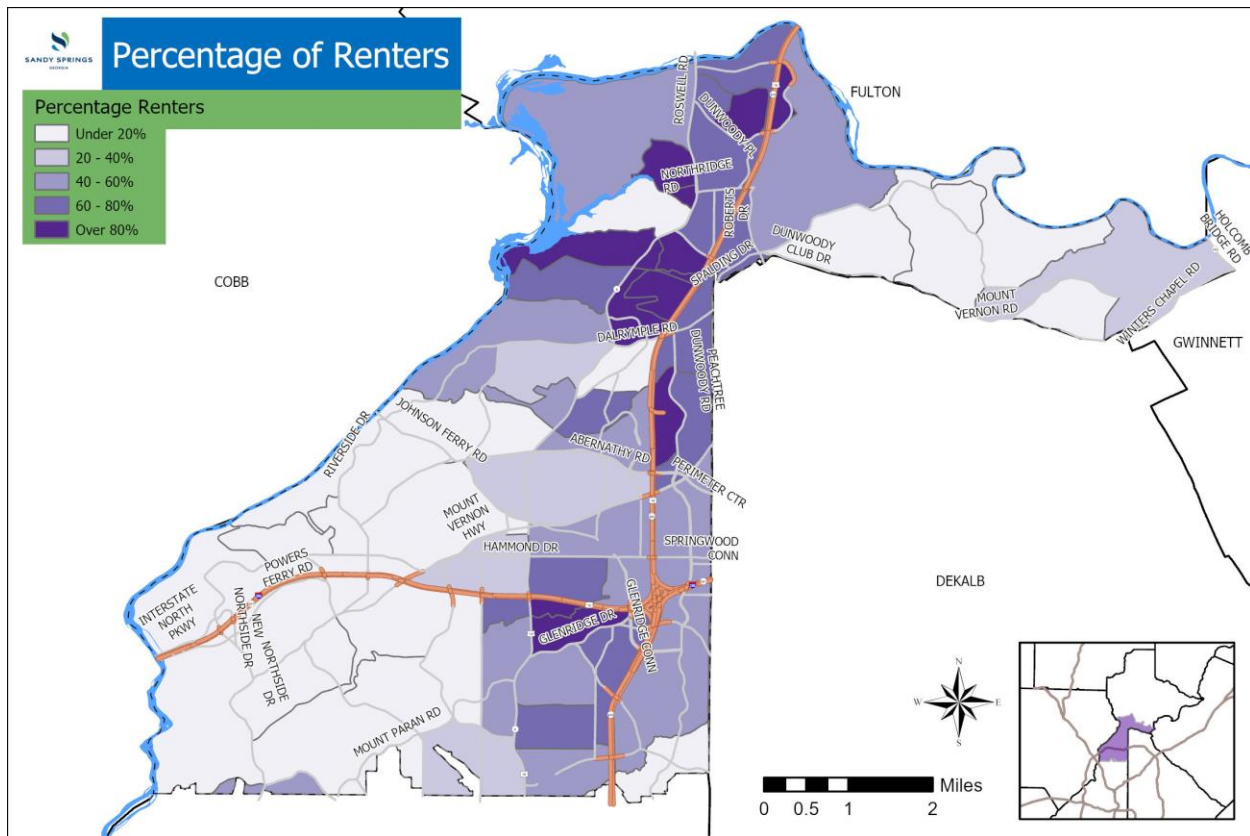
Exhibit III-27: Percentage of Homeowners by Census Block Group³⁶



³⁶ 2017, ACS 5-Year Estimates

Continuing the evaluating of the distribution of the housing profile in Sandy Springs, Exhibit III-28 illustrates the percentage of the renting population using 2017 ACS, 5-Year Estimates block group data.

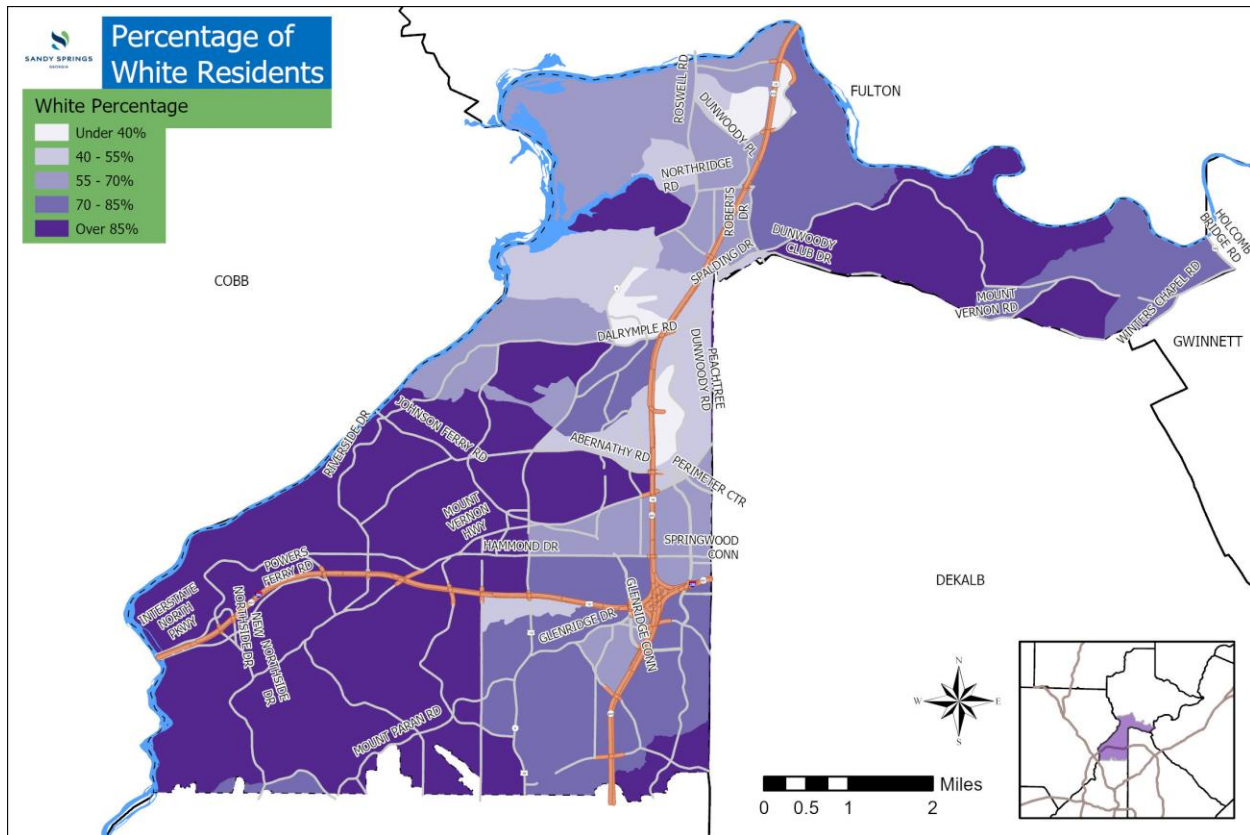
Exhibit III-28: Percentage of Renters by Census Block Group³⁷



³⁷ 2017, ACS 5-Year Estimates

Further evaluating the racial distribution of residents in Sandy Springs, Exhibit III-29 illustrates the concentration of White residents using 2017 ACS, 5-Year Estimates block group data.

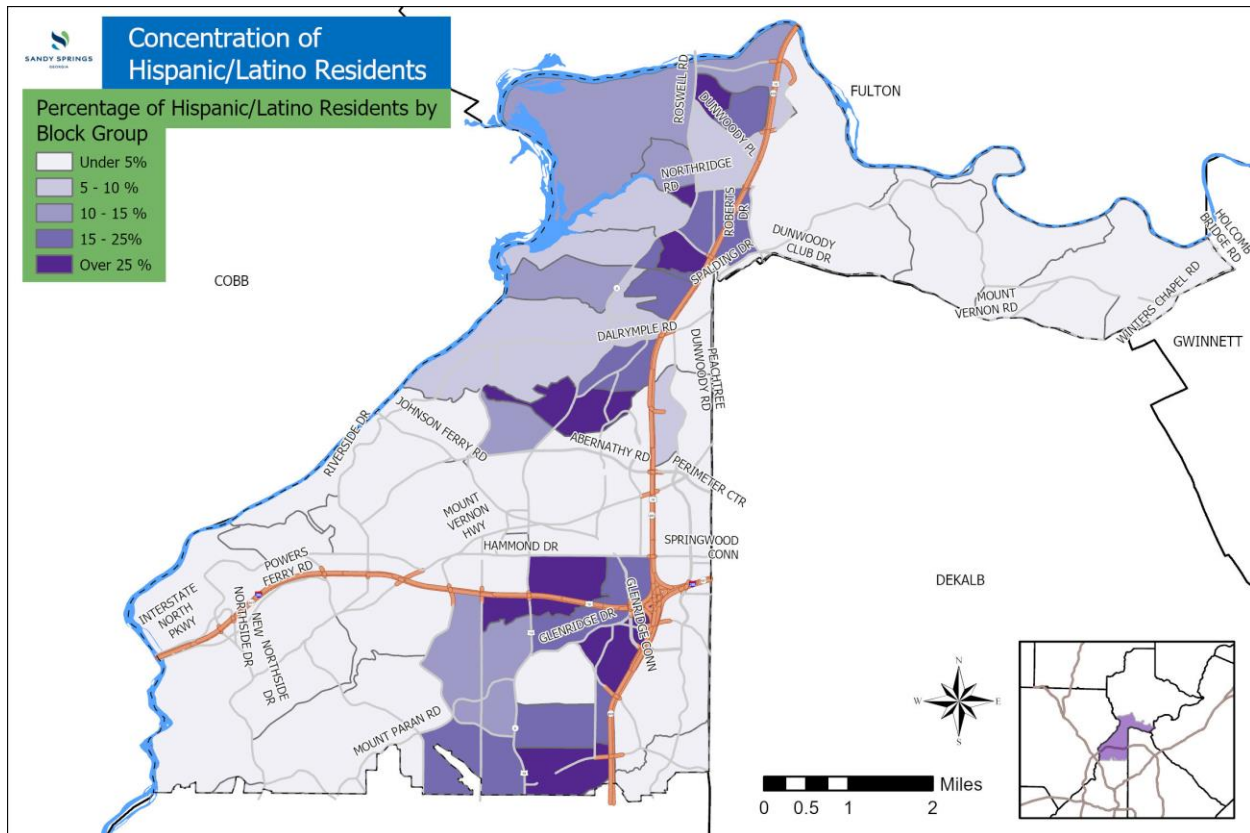
Exhibit III-29: Percentage of White Residents in Sandy Spring by Block Group³⁸



³⁸ 2017, ACS 5-Year Estimates

To further evaluate the racial distribution of residents in Sandy Springs, Exhibit III-32 illustrates the concentration of Hispanic residents using 2017 ACS, 5-Year Estimates block group data.

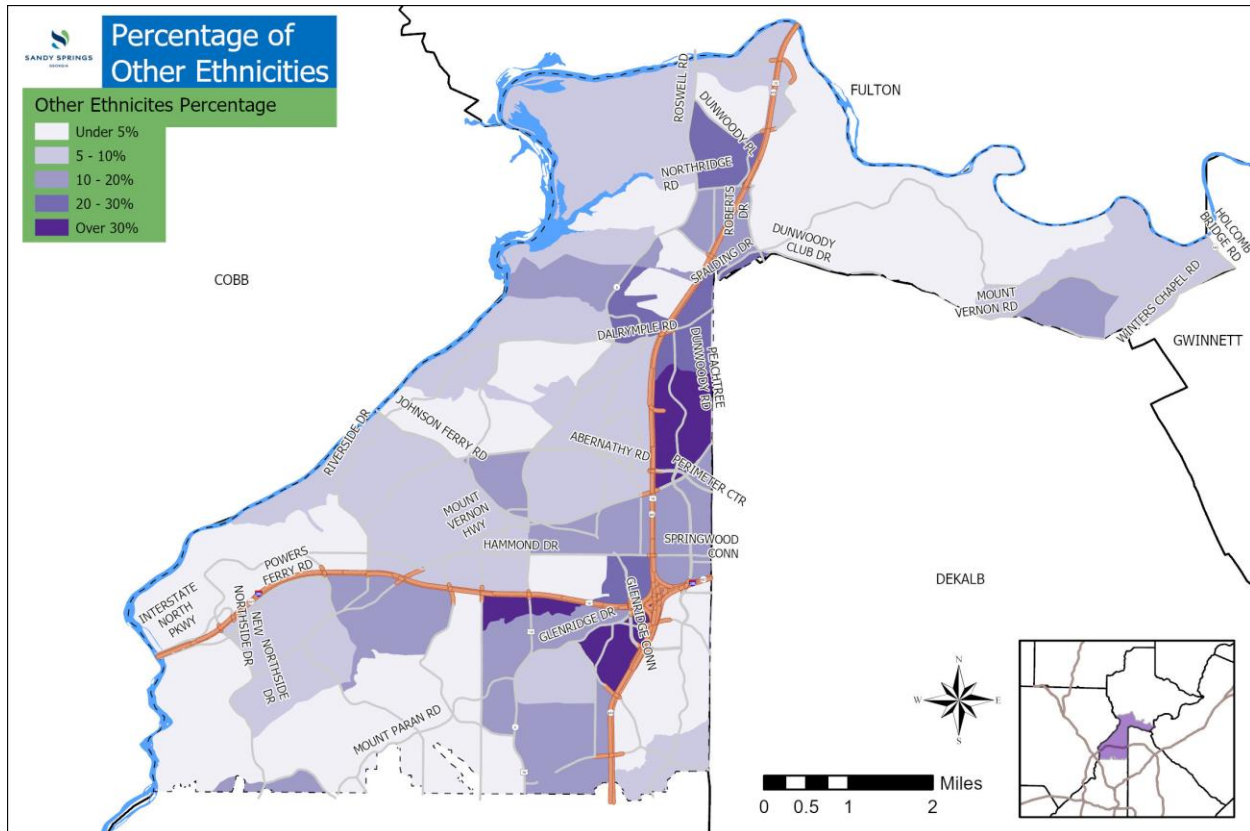
Exhibit III-32: Percentage of Hispanic Residents in Sandy Spring by Block Group⁴⁰



⁴⁰ 2017, ACS 5-Year Estimates

To further evaluate the racial distribution of residents in Sandy Springs, Exhibit III-33 illustrates the concentration of other ethnicities resident using 2017 ACS, 5-Year Estimates block group data.

Exhibit III-33: Percentage of Other Ethnicities Resident in Sandy Spring by Block Group⁴¹



⁴¹ 2017, ACS 5-Year Estimates

Section III.

Evaluation of Jurisdiction's Current Fair Housing Legal Status

As part of the AI, a review was conducted on the number and types of fair housing complaints filed in Sandy Springs. In Georgia, several agencies are involved in tracking and resolving complaints.

The U.S. Department of Housing and Urban Development's Region IV Atlanta office is a resource for fair housing information, as well as for the filing of fair housing complaints. Specifically, the mission of the Office of Fair Housing and Equal Opportunity (FHEO) is to create equal opportunities for all persons by enforcing laws that prohibit discrimination based on race, color, religion, sex, national origin, disability and familial status. In addition to enforcing fair housing laws, FHEO also establishes national policies that ensure all Americans have equal access to the housing of their choice. Those who feel they have experienced discrimination under the Federal Fair Housing Act can file a complaint with FHEO through HUD's website at www.hud.gov.

The U.S. Department of Justice will bring suit on behalf of individuals who file complaints with HUD in cases where there is reason to believe a person or entity has engaged in a pattern or practice of discrimination or where a denial or rights to a group of persons raises an issue of general public importance. In cases involving discrimination in mortgage loans or home improvement loans, the department may file suit under the Fair Housing Act or the Equal Credit Opportunity Act.

The Georgia Commission on Equal Opportunity enforces the Georgia Fair Housing Law O.C.G.A 8-3-200, *et seq*, which is substantially equivalent to Federal fair housing law and prohibits various forms of discrimination in residential real estate transactions on the basis of race, color, religion, sex, national origin, disability and familial status. Those who feel they have experienced discrimination under the Georgia Fair Housing Law can also file a complaint with the Commission.

Finally, Atlanta Metro Fair Housing (AMFH), a nonprofit fair housing agency located in East Point, assists with the enforcement of fair housing laws in the Atlanta area. Residents of the Atlanta metro area can file fair housing complaints with AMFH, who participates in HUD's Fair Housing Initiatives Program (FHIP). This program provides funding to public and private entities that create or carry out programs that prevent or eliminate discriminatory housing practices. Funding provided through FHIP supports projects and activities that are designed to enhance compliance with the Fair Housing Act and substantially equivalent State and local laws prohibiting housing discrimination. These activities include programs of enforcement, voluntary compliance, and education and outreach.

In addition to FHIP, FHEO has also provided federal funding to fair housing enforcement agencies since enactment of the 1968 Civil Rights Act. Regulations published at 24 CFR Part 115 provide authority to FHEO to fund initial capacity-building for fair housing agencies, followed by ongoing support for complaint processing, administrative costs, special enforcement actions, training and

other projects designed to enhance the fair housing agency's administration and enforcement of fair housing law. The Georgia Commission on Equal Opportunity is the recipient of FHAP funding in Georgia. FHAP agencies are used by HUD for the referral of complaints for investigation under a substantially equivalent local fair housing law.

The Fair Housing Division of the Georgia Commission on Equal Opportunity (GCEO) was contacted in September 2019 concerning fair housing complaints in Sandy Springs that may have occurred since 2015. According to the reporter provided by the GCEO, one concern was filed in 2015 and 2016. Two concerns were filed in 2017 and four cases were filed in 2018. One complaint was filed in 2019. Seven of the total concerns filed were on the bases of disability, one on the bases of race, and another one on the bases of national origin. The most common issue reported was related to discriminatory terms, conditions, or services. Out of the total nine complaints received by the GCEO, three cases were closed due to no cause determination, other three cases closed resulting in successful conciliation/settlement, and two cases were withdrawn by the complainants. The 2019 case remains open and no disposition has been issued.





Section IV.

Identification of Impediments to Fair Housing Choice

Public Sector

Comprehensive Plan

Sandy Springs completed its first Comprehensive Plan in June 2007. The Georgia's Department of Community Affairs (DCA) approved the city as a Qualified Local Government in December 2007. The Mayor and City Council initiated the process to prepare a new Comprehensive Plan and Small Area Plans in July 2015. On February 21, 2017, Mayor and City Council approved the Next Ten Comprehensive Plan. The Next Ten Comprehensive Plan is the policy framework that articulates the direction of future strategic actions to be taken by Sandy Springs to preserve and enhance the city's quality of life. Some of the policies articulated in the Comprehensive Plan include:

-  Housing
-  Economic Development
-  Transportation
-  Green Space, Natural Systems & Sustainability

The Next Ten Comprehensive Plan has a number of policies that encourage and support housing, promote fair housing and a high quality of life for Sandy Springs residents including the following:

Housing

1. Manage growth to locate new housing in selected redevelopment areas. This should be done by modifying zoning to allow greater mix of uses and infill development in target development and redevelopment areas as well as providing incentives for new projects in these target areas.
2. Increase the supply and range of housing choices for middle-income households by promoting a variety of attainable housing products such as: small-lot single family houses, cottage-style housing, townhomes, multifamily, bungalow court for-sale units and the like. This can be done by increasing housing density in target redevelopment areas and promoting accessory dwelling units or live-work units. Incentives to improve affordability of rental and for-sale housing includes offering fee waivers and/or tax abatements, expedited permitting, density/height bonuses, reducing parking minimums, eliminating housing size minimums. Championing employer-assisted housing programs that provide down payment assistance, low-interest loans, tax credits, or monthly housing reimbursements to employees that live in Sandy Springs.
3. Balance local jobs and household growth. Complement employment growth with additions to the local housing supply, particularly in office-heavy zones.
4. Provide resources and assistance for senior residents, empty nester and special needs-population by making it easier for senior residents, the disabled, and other special-needs population to maintain their homes and age in place. This can be done by encouraging the inclusion of senior-appropriate housing in mixed-house developments; consider requiring a certain percentage of homes that meet visitability or universal design standards; encourage continuing care retirement communities; avoid regulations and practices that would discourage the provision of housing for persons with disabilities. To address homelessness, Sandy Springs should utilize the existing homeless service referral networks that exist in the City of Atlanta such as the Gateway Center. Additionally, Sandy Springs should maintain strong relations with the Housing Authority of Fulton County, Meals on Wheels Atlanta, and other local organizations that specialize in providing programs such as housing vouchers, home repair or retrofit assistance and other services.
5. Focus new housing supply in vibrant, mixed-use districts. This should be done by redeveloping existing open air shopping center malls and office parks, and include residential uses in the mix.

Economic Development

1. Connect existing and prospective employers with the workforce training programs offered through the Georgia Department of Labor, Georgia Quick Start, and the Gwinnett Technical College Economic Development Program.
2. Pursue possible expansions of incentive programs to support quality workforce housing.
3. Modify zoning requirements to permit a greater mix of land uses and to increase permissible residential and commercial densities in appropriate locations along Roswell Road, near MARTA stations areas, and in the Perimeter Center.
4. Consider updating the City's incentive program to allow quality housing developments to be incentivized.

Transportation

1. Require the provision of amenities that support alternative commuting modes and accommodate additional mobility services in new developments and developed areas. New developments, particularly those that will include substantial new employment, must include amenities such as reserve parking spaces for carpool vehicles; secure bicycle parking, quality pedestrian connections and site design that will enhance alternative commuting options.
2. Expand bicycle access to MARTA stations in the area extending one-mile (or more) around stations.
3. Accommodate private shuttle and transit access to MARTA stations. Transfers to and from both public and private connecting transit or ride-sharing services should be easy to navigate and convenient to rider needs. In particular, consider the needs of senior citizens, including circulator and human services transportation options, and the need to provide easily intuitive, accessible connections to other modes at stations.
4. Continue to address sidewalk gaps by prioritizing major pedestrian travel corridors, such as those along and through commercial areas and transit stations and corridors or to and from schools, parks and other community amenities.

Green Space, Natural Systems & Sustainability

1. Partner with neighborhoods and homeowners associations to develop new parks (including neighborhood pocket parks), green spaces, trails, and outdoor recreation facilities.
2. Identify vacant land near schools and churches for potential use as parks, green space or recreational facilities, and explore opportunities for joint development and use of parks and recreation spaces with public and private entities, including schools.

Land Use and Community Character

The City has policies in place to promote mix housing and exert the neutral effect on the existence of such concentrations. Also, the City encourages cluster development and the development of mixed income housing developments that provide a variety of unit types; the City's regulation do not restrict the location of housing for persons with disabilities. The City's policies regarding housing mix are as follows:

1. Quality housing and a range of housing size, cost, and density should be encouraged in the City
2. Encourage a variety of home styles, densities and price ranges in locations that are accessible to jobs and services to ensure housing for individuals and families of all incomes and age groups.
3. Encourage a mix of land uses at key nodes and activity center, as well as along major commercial corridors, to support multimodal transportation options and greater range of

housing choices, while preserving the character of existing single-family residential neighborhoods.

4. Where appropriate, encourage the inclusion of a variety of housing types for transition to neighborhoods, with emphasis on homeownership (including multifamily condominium, townhomes, and small-lot single family houses) .
5. Encourage and incentivize the formation of mixed-use neighborhood on both sides of Roswell Road immediately south of I-285, to provide a mix of uses and range of housing choices close to Roswell Road and the Medical Center area.
6. Attached housing for seniors is encouraged to be included in mixed-use developments and areas designated as appropriate for live-work. Senior housing may also be freestanding if located in community or regional live/work areas as designated on the future land use plan map. In addition to live-work areas, an assessment of detached elder units should be evaluated for their appropriateness in protected neighborhoods.
7. Encourage “life cycle” or “mixed generation” communities that provide for persons of different age groups (including seniors) to live in the same community as they age.
8. Continuing care retirement communities are encouraged in locations determined to be appropriate and compatible with surrounding residential neighborhoods.
9. Housing should be made available for seniors and disabled persons that contain a single-level with no-step entrances and wide doorways.
10. Avoid regulations and practices that would discourage the provision of housing for persons with disabilities.

The City is unaware of any management policies and procedures utilized by housing providers (those providing housing to persons with disabilities and homeless persons) that could result in opposition to such housing. A Fair Housing Brochures in English and Spanish have been distributed to each apartment community within the City and to all social service providers in the City.

The impact of the City’s zoning ordinance(s), building codes, and other land use or fiscal policies on the provision of lower-income housing has been aggressive in the enforcement of building and property maintenance codes, thus ensuring that the city’s lower-income housing stock is well maintained. Since 2005, when Sandy Springs was incorporated, the condition of the City’s lower-income housing stock has improved significantly.

Sandy Springs has very little vacant land available for development. The City's zoning regulations encourages medium and high density residential development, particularly where is good access to mass transit and jobs. Reduced frontages as well as front and side yard setbacks are allowed per the Zoning Code. Sandy Springs not only allows, but the City Council has approved higher density development within the City.

The Metropolitan Planning Organization and the Atlanta Regional Commission (ARC) does focus on the region's housing, housing related issues and problems. Sandy Springs is an active participant in these discussions. Participation in the ARC is the best way to address the FHP process from the regional perspective.

Neighborhood Revitalization, Municipal and Other Services/ Employment-Housing-Transportation Linkage

Transportation for the City consist of mass transit that is available primarily along commercial corridors and within activity centers. Social services within Sandy Springs are located in close proximity to the Roswell Road corridor and the mass transit service along this corridor. Schools are located throughout the City. Banks, and other lending institutions are located within each of the activity centers in the City: Powers Ferry Landing, along the Roswell Road corridor, and within the Perimeter Center area.

Accessible transportation services are available primarily along the Roswell Road corridor and within activity centers. However, MARTA does operate a special transit service within Sandy Springs for persons with disabilities that provides enhanced service. Health services are available throughout Sandy Springs, but are most concentrated in activity centers along Roswell Road and near the hospital district. Forty percent of the hospital beds in the Atlanta region are located within Sandy Springs. The three hospitals in the city are all located in close proximity to the intersection of Peachtree Dunwoody and Johnson Ferry Roads, all within walking distance of the MARTA Medical Center subway station. All of the aforementioned services are equally distributed throughout the geographic area of the City.

The Metropolitan Planning Organization, the Atlanta Regional Commission provides an excellent source of information not only regarding efforts of Atlanta metro communities, but also regarding jurisdictions across the nation. The ARC has conducted training and information sessions regarding inclusionary housing, work force housing and alternative zoning codes highlighting innovations in these areas. There has been an enhanced effort to provide a variety of housing types within Sandy Springs as well as throughout the region. This effort has resulted in rezoning approvals that provide for denser housing - both owner occupied and rental near activity centers.

Since the City was established in late 2005, Sandy Springs has pushed apartment owners to keep their properties in good repair, via our Code Enforcement efforts. This has resulted in the sale of apartment properties where owners were unwilling to make the necessary repairs to new owners who were willing to make the investment needed to renovate these properties. The underlying goal of these Code Enforcement efforts is to ensure decent and safe housing to residents of the

City. Apartment owners are required to submit inspection reports to the City for their properties annually.

The City has a strategy to ensure decent and safe housing to all residents of Sandy Springs. This strategy has resulted in the creation of the Apartment Inspection Program. Each year we evaluate the program and make changes as warranted.

PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders⁴²

Application/Tenant Selection/Assignment Policies

PUBLIC HOUSING: When a family wishes to reside in public housing, the family must submit an application that provides the Housing Authority of Fulton County, Georgia (“HAFC”) with the information needed to determine the family’s eligibility. HUD requires HAFC to place all eligible families that apply for public housing on a waiting list. When a unit becomes available, HAFC must select families from the waiting list in accordance with HUD requirements and HAFC policies as stated in its Admissions and Continued Occupancy Policy (ACOP) and its annual plan.

HAFC is required to adopt a clear approach to accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or HAFC to receive preferential treatment.

HUD regulations require that HAFC comply with all equal opportunity requirements and it must affirmatively further fair housing goals in the administration of the program [24 CFR 960.103, PH Occ GB p. 13]. Adherence to the selection policies described in the ACOP ensures that HAFC will be in compliance with all relevant fair housing requirements, as described in the ACOP.

HOUSING CHOICE VOUCHER: When a family wishes to receive assistance under the Housing Choice Voucher (“HCV”) program, the family must submit an application that provides HAFC with the information needed to determine the family’s eligibility. HUD requires HAFC to place all families that apply for assistance on a waiting list. Currently, there are 108 participants in the HCV. The HCV Waiting List is closed. When HCV assistance becomes available, HAFC must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in the administrative plan and the annual plan.

HAFC is required to adopt clear policies and procedures for accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow these policies and procedures consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or HAFC that

⁴² 2017 Housing Voucher Administrative Plan, March 16, 2017, Housing Authority of Fulton County, Georgia.

justify their selection. Examples of this are the selection of families for income targeting and the selection of families that qualify for targeted funding.

HUD regulations require that all families have an equal opportunity to apply for and receive housing assistance, and that HAFC affirmatively further fair housing goals in the administration of the program [24 CFR 982.53, HCV GB p. 4-1]. Adherence to the selection policies described in this chapter ensures that HAFC will be in compliance with all relevant fair housing requirements, as described in the HAFC Administrative Plan.

There is no pattern in one or more assisted housing developments of concentration of tenants by race or ethnicity. Additionally, The Housing Authority of Fulton County, Georgia (“HAFC”) does not discriminate because of race, color, sex, religion, familial status, age, disability or national origin (called “protected classes”). HAFC complies fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment.

PHA Policy for Rejecting Units while on Waiting List

HAFC c for offering units to applicants. Under this plan, HAFC will determine how many locations within its jurisdiction have available units of suitable size and type in the appropriate type of project. The number of unit offers will be based on the distribution of vacancies. If a suitable unit is available in:

Three (3) or more locations: The applicant will be offered a unit in the location with the highest number of vacancies. If the offer is rejected, the applicant will be offered a suitable unit in the location with the second highest number of vacancies. If that unit is rejected, a final offer will be made in the location with the third highest number of vacancies. The offers will be made in sequence and the applicant must refuse an offer before another is made.

Two (2) locations: The applicant will be offered a suitable unit in the location with the higher number of vacancies. If the offer is rejected, a final offer will be made at the other location. The offers will be made in sequence and the applicant must refuse the first offer before a second offer is made.

One (1) location: The applicant will be offered a suitable unit in that location. If the offer is rejected, the applicant will be offered the next suitable unit that becomes available, whether it is at the same location as the first offer or at another location. The second unit offer will be the final offer, unless there is good cause for refusing the offer. If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.

TIME LIMIT FOR UNIT OFFER ACCEPTANCE OR REFUSAL

Applicants must accept or refuse a unit offer within 3 business days of the date of the unit offer. Offers made by telephone will be confirmed by letter.

REFUSALS OF UNIT OFFERS

Good Cause for Unit Refusal

An elderly or disabled family may decline an offer for designated housing. Such a refusal must not adversely affect the family's position on or placement on the public housing waiting list [24 CFR 945.303(d)]. Applicants may refuse to accept a unit offer for "good cause." Good cause includes situations in which an applicant is willing to move but is unable to do so at the time of the unit offer, or the applicant demonstrates that acceptance of the offer would cause undue hardship not related to considerations of the applicant's race, color, national origin, etc. [PH Occ GB, p. 104]. Examples of good cause for refusal of a unit offer include, but are not limited to, the following:

The family demonstrates to HAFC's satisfaction that accepting the unit offer will require an adult household member to quit a job, drop out of an educational institution or job training program, or take a child out of day care or an educational program for children with disabilities.

The family demonstrates to HAFC's satisfaction that accepting the offer will place a family member's life, health, or safety in jeopardy. The family should offer specific and compelling documentation such as restraining orders, other court orders, risk assessments related to witness protection from a law enforcement agency, or documentation of domestic violence, dating violence, sexual assault or stalking in accordance with section 16-VII.D of this ACOP. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exemption.

A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members (as listed on final application) or live-in aide necessary to the care of the principal household member.

The unit is inappropriate for the applicant's disabilities, or the family does not need the accessible features in the unit offered and does not want to be subject to a 30-day notice to move.

The unit has lead-based paint and the family includes children under the age of six.

In the case of a unit refusal for good cause the applicant will not be removed from the waiting list as described later in this section. The applicant will remain at the top of the waiting list until the family receives an offer for which they do not have good cause to refuse.

HAFC will require documentation of good cause for unit refusals.

Unit Refusal without Good Cause

When an applicant rejects the final unit offer without good cause, HAFC will remove the applicant's name from the waiting list and send notice to the family of such removal. The notice will inform the family of their right to request an informal hearing and the process for doing so under the HAFC Administrative Plan.

The applicant may reapply for assistance if the waiting list is open. If the waiting list is not open, the applicant must wait to reapply until HAFC opens the waiting list.

Section 8 Certificates/Vouchers

Freedom housing choice is a hallmark of the housing choice voucher (HCV) program. In general, HUD regulations impose few restrictions on where families may live or move with HCV assistance. The HAFC Administrative Plan sets forth HUD regulations and PHA policies governing moves within or outside HAFC's jurisdiction. The HCV program offers mobility to eligible families because they may search for suitable housing anywhere in HAFC's jurisdiction and may also be eligible to move under portability to other PHAs' jurisdictions.

Within the limitations of the regulations and this plan, a participant family or an applicant family that has been issued a voucher has the right to use tenant-based voucher assistance to lease a unit anywhere in the United States providing that the unit is located within the jurisdiction of a PHA administering a tenant-based voucher program [24 CFR 982.353(b)]. The process by which a family obtains a voucher from one PHA and uses it to lease a unit in the jurisdiction of another PHA is known as portability. HAFC that issues the voucher is called the initial PHA. HAFC that has jurisdiction in the area to which the family wants to move is called the receiving PHA.

The receiving PHA has the option of administering the family's voucher for the initial PHA or absorbing the family into its own program. Under the first option, the receiving PHA provides all housing services for the family and bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher. Under the second option, the receiving PHA pays for the family's assistance with its own program funds, and the initial PHA has no further relationship with the family. The initial PHA must contact the receiving PHA via email or other confirmed delivery method to determine whether the receiving PHA will administer or absorb the initial PHA's voucher. Based on the receiving PHA's response, the initial PHA must determine whether they will approve or deny the portability request [Notice PIH 2012-42].

PHAs commonly act as both the initial and receiving PHA because families may move into or out of their jurisdiction under portability. Each role involves different responsibilities. HAFC will follow the rules and policies in section 10-II.B when it is acting as the initial PHA for a family. It will follow the rules and policies in section 10-II.C when it is acting as the receiving PHA for a family.

Allowable Moves under Portability

A family may move with voucher assistance only to an area where there is at least one PHA administering a voucher program [24 CFR 982.353(b)]. If there is more than one PHA in the area, the initial PHA may choose the receiving PHA [24 CFR 982.355(b)].

Applicant families that have been issued vouchers as well as participant families may qualify to lease a unit outside HAFC's jurisdiction under portability. HUD regulations and PHA policy, determines whether a family qualifies.

Under HUD regulations, most applicant families qualify to lease a unit outside HAFC's jurisdiction under portability. However, HUD gives HAFC discretion to deny a portability move by an applicant family for the same two reasons that it may deny any move by a participant family: insufficient funding and grounds for denial or termination of assistance.

In determining whether or not to deny an applicant family permission to move under portability because the HAFC lacks sufficient funding or has grounds for denying assistance to the family, the initial PHA will follow the policies established in section 10-I.B of the HAFC Administrative Plan.

In addition, HAFC may establish a policy denying the right to portability to nonresident applicants during the first 12 months after they are admitted to the program [24 CFR 982.353(c)].

If neither the head of household nor the spouse/co-head of an applicant family had a domicile (legal residence) in the HAFC's jurisdiction at the time that the family's initial application for assistance was submitted, the family must lease a unit within the initial PHA's jurisdiction for at least 12 months before requesting portability.

HAFC will consider exceptions to this policy for purposes of reasonable accommodation (see Chapter 2) or reasons related to domestic violence, dating violence, and sexual assault or stalking. However, any exception to this policy is subject to the approval of the receiving PHA [24 CFR 982.353(c)(3)].

The initial PHA must not provide portable assistance for a participant if a family has moved out of its assisted unit in violation of the lease [24 CFR 982.353(b)]. The Violence against Women Act of 2013 (VAWA) creates an exception to this prohibition for families who are otherwise in compliance with program obligations but have moved to protect the health or safety of a family member who is or has been a victim of domestic violence, dating violence, sexual assault or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the unit [24 CFR 982.353(b)].

HAFC will determine whether a participant family may move out of HAFC's jurisdiction with continued assistance in accordance with the regulations and policies set forth here and in sections 10-I.A and 10-I.B of this chapter. HAFC will notify the family of its determination in accordance with the approval policy set forth in the HAFC Administrative Plan.

HUD requires HAFC to assist families in their housing search by providing the family with a list of landlords or other parties known to HAFC who may be willing to lease a unit to the family, or to help the family find a unit. Although HAFC cannot maintain a list of owners that are pre-qualified to participate in the program, owners may indicate to HAFC their willingness to lease a unit to an eligible HCV family, or to help the HCV family find a unit [24 CFR 982.301(b)(11)]. HAFC Policy is that owners that wish to indicate their willingness to lease a unit to an eligible HCV family or to help the HCV family find a unit must notify the HAFC. The HAFC maintains a listing of such owners and provides this listing to the HCV family as part of the informational briefing packet.

The HAFC gives the voucher holders an oral briefing and provides the family with a briefing packet containing written information about the program. Included but not limited to in the briefing packet:

- How the Housing Choice Voucher program works;
- Family and owner responsibilities;
- Where the family can lease a unit, including renting a unit inside or outside HAFC's jurisdiction;
- For families eligible under portability, an explanation of portability. HAFC cannot discourage eligible families from moving under portability;
- For families living in high-poverty census tracts, an explanation of the advantages of moving to areas outside of high-poverty concentrations;

A partial list of documents and information which must be provided in the briefing packet include the following:

- Where the family may lease a unit. For a family that qualifies to lease a unit outside the PHA jurisdiction under portability procedures, the information must include an explanation of how portability works.
- A statement of HAFC policy on providing information about families to prospective owners.
- The HUD brochure on how to select a unit.
- Information on federal, state and local equal opportunity laws and a copy of the housing discrimination complaint form.
- A list of landlords or other parties willing to lease to assisted families or help families find units, especially outside areas of poverty or minority concentration.
- Notice that if the family includes a person with disabilities, the family may request a list of available accessible units known to HAFC.
- Maps showing areas with housing opportunities outside areas of poverty or minority concentration, both within its jurisdiction and its neighboring jurisdiction
- Information about the characteristics of these areas including job opportunities, schools, transportation, and other services
- An explanation of how portability works, including a list of portability contact persons for neighboring PHAs with names, addresses, and telephone numbers

Initial Inspections

HAFC conducts initial inspections in response to a request from the family to approve a unit for participation in the HCV program. The unit must pass the Housing Quality Standard inspection on or before the effective date of the HAP Contract.

When a family approaches an owner to apply for tenancy, the owner is responsible for screening the family and deciding whether to lease to the family, just as the owner would with any potential unassisted tenant. HAFC has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy.

If the owner is willing, the family and the owner must jointly complete a Request for Tenancy Approval (RTA, Form HUD 52517), which constitutes the family's request for assistance in the specified unit, and which documents the owner's willingness to lease to the family and to follow the program's requirements.

When submitted to HAFC, this document is the first step in the process of obtaining approval for the family to receive the financial assistance it will need in order to occupy the unit. Also submitted with the RTA is a copy of the owner's proposed dwelling lease, including the HUD-required Tenancy Addendum (Form HUD-52641-A). HUD regulations stipulate requirements for the approval of an assisted tenancy.

The owner must be qualified to participate in the program [24 CFR 982.306]. Some owners are precluded from participating in the program, or from renting to a particular family, either because of their past history with this or another federal housing program, or because of certain conflicts of interest. Owner qualifications are discussed later in this chapter.

The selected unit must be of a type that is eligible for the program [24 CFR 982.305(a)]. Certain types of dwelling units cannot be assisted under the HCV program. Other types may be assisted under certain conditions.

The selected unit must meet HUD's Housing Quality Standards (HQS) and/or equivalent state or local standards approved by HUD [24 CFR 982.305(a)]. HAFC will inspect the owner's dwelling unit at least annually to ensure that the unit continues to meet HQS requirements.

HAFC must determine that the proposed rent for the unit is reasonable [24 CFR 982.305(a)]. The rent must be reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises.

At initial lease-up of a unit, if the gross rent exceeds the applicable payment standard, HAFC must ensure that the family share does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)].

The dwelling lease must comply with all program requirements [24 CFR 982.308]. Owners are encouraged to use their standard leases when renting to an assisted family. The HUD Tenancy Addendum includes the HUD requirements governing the tenancy and must be added word-for-word to the owner's lease.

HAFC is responsible for ensuring that very low income families have access to all types and ranges of affordable housing in its jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for HAFC to ensure that a sufficient number of owners, representing all types and ranges of affordable housing in the HAFC's jurisdiction, are willing to participate in the HCV program.

To accomplish this objective, HAFC identifies and recruits new owners to participate in the program. HAFC conducts owner outreach to ensure that owners are familiar with the program

and its advantages. HAFC actively recruits property owners with property located outside areas of poverty and minority concentration. These outreach strategies include:

- Distributing printed material about the program to property owners and managers
- Contacting property owners and managers by phone or in-person
- Holding owner recruitment/information meetings at least once a year

During oral briefings, HAFC provides information for families living in high-poverty census tracts, an explanation of the advantages of moving to areas outside of high-poverty concentrations. In the briefing package HAFC provides families with a list of landlords or other parties willing to lease to assisted families or help families find units, especially outside areas of poverty or minority concentration. Also provided in the briefing package are maps showing areas with housing opportunities outside areas of poverty or minority concentration, both within HAFC's jurisdiction and its neighboring jurisdiction, as well as information about the characteristics of these areas including job opportunities, schools, transportation, and other services.

Promotion of Accessible Housing Resources

HAFC assists all HCV participants in finding housing, as stated in Question 10 above. For the HAFC Housing Choice Voucher program, HAFC must comply with a variety of regulations pertaining to physical accessibility, including the following:

- Notice PIH 2010-26
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

HAFC's policies concerning physical accessibility must be readily available to applicants and participants. They can be found in three key documents:

- This HAFC Administrative Plan describes the key policies that govern HAFC's responsibilities with regard to physical accessibility.
- Notice PIH 2010-26 summarizes information about pertinent laws and implementing regulations related to nondiscrimination and accessibility in federally-funded housing programs
- The HAFC Administrative Plan provides information about self-evaluation, needs assessment, and transition plans.

When issuing a voucher to a family that includes an individual with disabilities, HAFC will include a current list of available accessible units known to HAFC and will assist the family in locating an available accessible unit, if necessary.

In general, owners must permit the family to make reasonable modifications to the unit. However, the owner is not required to pay for the modification and may require that the unit be restored to its original state at the family's expense when the family moves.

HAFC assists all HCV participants in finding housing, as stated in Question 10 above. HAFC provides reasonable accommodation to the needs of individuals with disabilities.

HAFC has one property located at 144 Allen Road, Sandy Springs, Georgia, designated for persons defined as either "Elderly" or "Disabled". HAFC also has units in South Fulton County for persons defined as either "Elderly" or "Disabled".

The design, construction, or alteration of HAFC facilities must conform to the Uniform Federal Accessibility Standards (UFAS). Newly-constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the HCV program.

Sale of Subsidized Housing and Possible Displacement⁴³

In the event of the sale of any HAFC owned property, all tenant relocation will be handled in accordance with standards specified under the Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs.

HAFC take steps to ensure that such households are provided a varied choice of replacement housing, particularly to give minority displaced households an opportunity to select housing outside-not just inside-minority-concentrated areas.

For displacement and ensuring that persons with disabilities can choose housing in a variety of accessible locations, HAFC's policy is in accordance with standards specified under the Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs.

Property Tax Policies

Residents of Sandy Springs can take advantage of property tax relief. The relief policies includes the following:

1. Statewide school exemption
2. County tax exemption
3. Fulton County exemption
4. Local school tax exemption
5. Fulton County full tax exemption

⁴³ 2017 Housing Voucher Administrative Plan, March 16, 2017, Housing Authority of Fulton County.

6. Exemptions for 65 or older
7. State exemption (no income requirement)
8. Surviving spouse of peace officer or firefighter
9. Disabled veterans
10. Veterans surviving spouse

These policies and provisions benefit lower income homeowners by the capping eligibility by maximum allowable income, either as a dollar amount or percent of federal poverty level. There is no reference to minority populations, although any minorities that are eligible in terms of income would benefit from these provisions that lower property taxes. The only mention is for persons with disabilities.

Planning and Zoning Boards

The Board of Appeals (formerly known as Board of Zoning Appeals) is a quasi-legal board charged with hearing requests for variances from regulations of the Zoning Ordinance. The board bases decisions on the merits of applications with strict adherence to specific factors. The board consist of five Caucasian males, one African American male, and one African American female.

The Planning Commission is an advisory board which reports its findings and recommendations to the Mayor and City Council. The board is involved in hearings involving re-zonings, use permits, concurrent variances, and changes to zoning maps and ordinances. The board consist of five Caucasian males and two Caucasian females.

Building Codes (Accessibility)

An internal review of the Sandy Springs' Development Code, building codes , and other city programs and policies was completed to assess potential fair housing concerns as part of the Analysis of Impediments to Fair Housing. The review did not identify any areas that could negatively affect fair housing choice. The analysis followed the suggested approach outlined in the HUD Office of Fair Housing and Equal Opportunity's *Fair Housing Planning Guide* for reviewing public sector policies. The city's zoning ordinance, building codes and land use controls were found to have a neutral effect on the promotion and the development of affordable housing.

Since its incorporation, Sandy Springs has taken an active role in the enforcement of its property maintenance code that requires property owners to maintain their properties. Particular emphasis was initially placed on inspection and compliance efforts to address long-standing deterioration of the exteriors of apartment developments in the city. The city's apartment inspection ordinance now ensures a percentage of units are certified as in compliance with the code on a rotating basis to maintain the housing quality of rental units in Sandy Springs.

Private Sector

Lending Policies and Practices

Typically, mortgage lending data, legal and fair housing complaints filed for a jurisdiction are included in an Analysis of Impediments to Fair Housing. Community Reinvestment Act (CRA) and Home Mortgage Disclosure Act (HMDA) data are examined to determine if there is evidence of potential or existing discrimination in lending or community disinvestment. Complaints concerning fair housing are a means to identify the kinds of discrimination that may be present, as well as how to address the conditions that led to those complaints. Evaluation of CRA and HMDA data can help to illuminate issues with investment or lending practices that may exist in Sandy Springs.

Community Reinvestment Act (CRA) Compliance

A federal law enacted in 1977, the Community Reinvestment Act, “is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods, consistent with safe and sound operations”⁴⁴ CRA was enacted by 12 U.S.C. 2901 and implemented through regulations published at 12 CFR Part 228. The regulations were revised in May 1995 and August 2005.

In summary, the CRA requires that a depository institution’s lending practices be periodically evaluated for consistency with the law. CRA examinations are conducted by four federal agencies responsible for overseeing these institutions. These institutions include the following:

1. Federal Reserve Board
2. Office of Thrift Oversight
3. Office of the Comptroller of the Currency
4. Federal Deposit Insurance Corporation

In addition, the Federal Financial Institutions Examination Council (FFIEC) maintains interagency information on a depository institution’s compliance with CRA. In conducting a broad overview of local banks, information on 4banks and lending institutions located or with branches in Sandy Springs were found. Three were found to have satisfactory and one outstanding ratings on their most recent CRA audits. Unfortunately, with mergers, online lending and other available loan options it has become more difficult to determine the true extent of a lender’s compliance with the intent of the CRA, which is to provide lending to the community where they are located. Therefore, it is important to examine Home Mortgage Disclosure Act data for a more complete picture of the availability of credit in a local community.

Home Mortgage Disclosure Act (HMDA)

⁴⁴ Federal Reserve Board website

The best source for determining the lending patterns in a community and whether there is discrimination in lending activity is to use Home Mortgage Disclosure Act (HMDA) data. Congress passed HMDA in 1975 for two purposes as described in the Act:

1. To provide the citizens and public officials of the United States with sufficient information to enable them to determine whether depository institutions are filling their obligations to serve the housing needs of the communities and neighborhoods in which they are located; and
2. To assist public officials in their determination of the distribution of public sector investments in a manner designed to improve the private investment environment.

HMDA also requires depository institutions and mortgage lenders to:

1. Disclose each year the action taken on all residential mortgage loan applications. This includes applications to purchase, rehabilitate or refinance a dwelling;
2. Report this data by the race, sex and income of the borrower and by the Census Tract in which the property is located. Lenders must also report the number of loans and total loan amounts made in each Census Tract; and
3. Provide this information upon request to community groups and members of the public.

Race and Ethnicity of Loan Applicants

Exhibit IV-I provides the aggregate data for the Atlanta-Sandy Springs-Roswell, GA MSA for 2017. These statistics are for FHA, FSA/RHS, VA and other non-conventional loans by race and ethnicity.

Exhibit IV-I: Disposition of applications for FHA, FSA/RHS, and VA home-purchase loans, 1- to 4- family and manufactured home dwellings, by race, ethnicity, gender and income of applicant, 2017. MSA/MD: 12060 - Atlanta-Sandy Springs-Roswell, GA⁴⁵

Race/Ethnicity	Applications received	Loans Originated	Applications Denied	Other
American Indian/Alaska Native	190	131 (69%)	15 (8%)	44 (23%)
Asian	1,233	827 (67%)	147 (12%)	259 (21%)
Black or African American	21,418	13,439 (62%)	2,968 (15%)	5,011 (23%)
Nat. Hawaiian/Pacific Islander	107	75 (70%)	12 (11%)	20 (19%)

⁴⁵ "Other" Category includes: Applications approved but not accepted, Applications withdrawn and Files Closed for Incompleteness for the FFIEC Aggregate Table 4-1 for FHA, FSA/RHS and VA home purchase loans.

White	23,270	17,125 (73%)	1,885 (9%)	4,260 (18%)
Hispanic or Latino	4,512	3,109 (69%)	444 (10%)	959 (21%)

Of the 50,730 total loan applications for the MSA listed in Exhibit IV-I, 46 percent were applications from White borrowers, 42 percent were applications from Black borrowers, 9 percent were from Hispanic/Latino borrowers and 3 percent were borrowers from the remaining racial groups. These aggregate data demonstrate that FHA, FSA/RHS and VA loan mortgage approval rates were similar across racial and ethnic groups reaching almost 70% approval rates for each racial and ethnic group. Blacks or African Americans had the highest denial rates (15%) followed by Asians (12%), Nat. Hawaiian/Pacific Islander (11%), and Hispanic Latinos (10%). .

Exhibit IV-II provides the aggregate HMDA data for the Atlanta-Sandy Springs-Roswell, GA MSA for 2017 for conventional loans by race and ethnicity.

Exhibit IV-II: Disposition of applications for conventional home-purchase loans 1- to 4- family and manufactured home dwellings, by race, ethnicity, gender and income of applicant, 2017.

46

Race/Ethnicity	Total Loan Applications	Loans Originated	Applications Denied	Other
American Indian/Alaska Native	243	159 (65%)	30 (13%)	54 (22%)

⁴⁶ "Other" Category includes: Applications approved but not accepted, Applications withdrawn and Files Closed for Incompleteness for the FFIEC Aggregate Table 4-2 for FHA, FSA/RHS and VA home purchase loans.

Asian	10,096	7,342 (73%)	717 (7%)	2,037 (20%)
Black or African American	12,284	7,236 (59%)	1,906 (15%)	2,842 (23%)
Nat. Hawaiian/Pacific Islander	147	97 (66%)	19 (13%)	31 (21%)
White	48,790	36,111 (74%)	3,607 7%	9,072 _(19%)
Hispanic or Latino	4,402	2,977 (68%)	532 (12%)	893 (20%)

As with the data for FHA, FSA/RHS and VA loans, White borrowers had the highest conventional loan approval rate of any racial or ethnic group in 2017 when looking at aggregate data. And as with nonconventional loan sources, White borrowers had the lowest loan denial rates and Black or African Americans had the highest denial rates for both nonconventional and conventional loans. .

Reasons for Loan Denials

The FFIEC requires HMDA data to include the reasons for loan denials as part of financial institution reporting practices. For the Atlanta-Sandy Springs-Roswell, GA MSA, the reasons for loan denials provide additional data for evaluating lending trends in 2017. The four most common reasons cited as justification for denial of a mortgage by a lender are the borrower's debt-to-income ratio, employment history, credit history, and collateral reasons. Data by race

and ethnicity is included for the MSA in Exhibit IV-III for non-conventional mortgages and Exhibit IV-IV for conventional mortgages. Denial rates are presented as the percent of applications that were denied for that reason by race and ethnicity.

Exhibit IV-III: Reasons for Denial of Applications for FHA, FSA/RHS and VA Home Purchase Loans for 1 to 4 Family Dwellings by Race/Ethnicity⁴⁷

Applicant Race/Ethnicity	Debt-to-Income Ratio	Employment History	Credit History	Collateral
White	26%	5%	16%	18%
Black or African American	34%	3%	19%	15%
Asian	38%	4%	11%	5%
American Indian/Alaska Native	50%	20%	0%	20%
Native Hawaiian/Pacific Islander	33%	0%	22%	22%
Hispanic/Latino	27%	6%	15%	16%

⁴⁷ FFIEC HMDA MSA/MA Aggregate Table 8-1 Report: 12060 – Atlanta-Sandy Springs-Roswell, GA
Page 64 of 72 D R A F T 2019-10-22

Exhibit IV-IV: Table 8-2: Reasons for denial of applications for conventional home-purchase loans, 1- to 4-family and manufactured home dwellings, by race, ethnicity, gender and income of applicant, Atlanta-Sandy Springs-Roswell, GA 2017⁴⁸

Applicant Race/Ethnicity	Debt-to-Income Ratio	Employment History	Credit History	Collateral
White	23%	2%	18%	25%
Black or African American	29%	2%	18%	21%
Asian	29%	3%	6%	18%
American Indian/Alaska Native	27%	4%	22%	13%
Native Hawaiian/Pacific Islander	29%	5%	23%	11%
Hispanic/Latino	28%	2%	16%	21%

In further evaluating loan origination data ⁴⁹, further, when examining Hispanic/Latino vs. Non-Hispanic/Latino borrowers, Non-Hispanic/Latino couple borrowers had 48, 227 loans originated compared to 2,977 for Hispanic/Latino borrowers; female Hispanic/Latino borrowers had the lowest origination rates at 805 loans originated.

⁴⁸ FFIEC HMDA MSA/MD Aggregate Table 8-2 Report: 12060 – Atlanta- Sandy Springs- Roswell, GA

⁴⁹ FFIEC HMDA Aggregate Table 4-2, Disposition of Application for Conventional Home Purchase loans, Atlanta-Sandy Springs-Roswell, GA, GA MSA

Public and Private Sector

Fair Housing Enforcement

As part of the AI, a review was conducted on the number and types of fair housing complaints filed in Sandy Springs. In Georgia, several agencies are involved in tracking and resolving complaints.

The U.S. Department of Housing and Urban Development's Region IV Atlanta office is a resource for fair housing information, as well as for the filing of fair housing complaints. Specifically, the mission of the Office of Fair Housing and Equal Opportunity (FHEO) is to create equal opportunities for all persons by enforcing laws that prohibit discrimination based on race, color, religion, sex, national origin, disability and familial status. In addition to enforcing fair housing laws, FHEO also establishes national policies that ensure all Americans have equal access to the housing of their choice. Those who feel they have experienced discrimination under the Federal Fair Housing Act can file a complaint with FHEO through HUD's website at www.hud.gov.

The U.S. Department of Justice will bring suit on behalf of individuals who file complaints with HUD in cases where there is reason to believe a person or entity has engaged in a pattern or practice of discrimination or where a denial or rights to a group of persons raises an issue of general public importance. In cases involving discrimination in mortgage loans or home improvement loans, the department may file suit under the Fair Housing Act or the Equal Credit Opportunity Act.

The Georgia Commission on Equal Opportunity enforces the Georgia Fair Housing Law O.C.G.A 8-3-200, *et seq*, which is substantially equivalent to Federal fair housing law and prohibits various forms of discrimination in residential real estate transactions on the basis of race, color, religion, sex, national origin, disability and familial status. Those who feel they have experienced discrimination under the Georgia Fair Housing Law can also file a complaint with the Commission.

Finally, Atlanta Metro Fair Housing (AMFH), a nonprofit fair housing agency located in East Point, assists with the enforcement of fair housing laws in the Atlanta area. Residents of the Atlanta metro area can file fair housing complaints with AMFH, who participates in HUD's Fair Housing Initiatives Program (FHIP). This program provides funding to public and private entities that create or carry out programs that prevent or eliminate discriminatory housing practices. Funding provided through FHIP supports projects and activities that are designed to enhance compliance with the Fair Housing Act and substantially equivalent State and local laws prohibiting housing discrimination. These activities include programs of enforcement, voluntary compliance, and education and outreach.

In addition to FHIP, FHEO has also provided federal funding to fair housing enforcement agencies since enactment of the 1968 Civil Rights Act. Regulations published at 24 CFR Part 115 provide authority to FHEO to fund initial capacity-building for fair housing agencies, followed by ongoing support for complaint processing, administrative costs, special enforcement actions, training and other projects designed to enhance the fair housing agency's administration and enforcement of

fair housing law. The Georgia Commission on Equal Opportunity is the recipient of FHAP funding in Georgia. FHAP agencies are used by HUD for the referral of complaints for investigation under a substantially equivalent local fair housing law.

Informational Programs

Sandy Springs has taken on many activities, some which are confined to National Fair Housing Month. The following are some of the activities and steps the City has implemented regarding fair housing laws and objectives:

1. Establish a fair housing information website.
 - This task was completed and information can be found on <http://spr.gs/cdbg1>
2. Highlight fair housing activities in Sandy Springs during National Fair Housing month every April.
 - The adopted a resolution in 2013 to recognize the Fair Housing Month each April of every year.
 - The City also participates in the Atlanta Housing Task Force by attending the meetings hosted by the ARC and DCA, which are hold every three months.
3. Explore partnerships with Sandy Springs Community Action Center (CAC) and Holy Spirit Catholic Church to ensure fair housing information is available for Hispanic/Latino residents.
 - In summer 2019, the City officially named the CAC as one of the required locations for publications of all CDBG documents. Executive summaries of these documents are translated in Spanish and are given to the CAC for public review. Additionally, fair housing flyers in English and Spanish are distributed to the CAC.
4. As a part of annual apartment certification requirements, provided information to landlords on fair housing.
 - Staff distributes fair housing flyers in-person to property managers of apartment complexes, especially to those located in the service area, where the South Roswell Road Sidewalk Project is taking place.
5. Developed a fair housing outreach program for residents of Sandy Springs' rental properties for support if residents suspect they have experienced housing discrimination.
 - The City reached out to the CAC and Cred-Ability (formerly Consumer Credit Counseling Service in 2015 to develop an annual joint event. Since then, no further action has taken place. For the 2020 AI, the City will consider collaborating with Clearpoint, a financial counseling nonprofit organization in Atlanta to offer

information on its services in Spanish and English on the City's website and Fair Housing Flyers.

6. Explore partnerships with Cred-Ability or other financial counseling agencies for outreach opportunities to Sandy Springs minority residents.
 - See recommendation #5 above.
7. Future Comprehensive Plan updates should analyze opportunities to directly incentivize the inclusion of mixed-income housing in future redevelopment projects consistent with Sandy Springs' policies.
 - The City updated its 2027 Comprehensive Plan in 2017 by adopting the Next Ten Comprehensive Plan. The Next Ten Comprehensive Plan adopted in February 2017 sets as one of its goals to "adopt a workforce housing ordinance specifying the number/percentage of units to be set aside as workforce housing and the size of projects to which this requirements applies." The new Development Code adopted in August 2017, provides incentives such as height bonuses for new developments that provide workforce housing units in specific zoning districts. There are two apartment complexes that have Land Use Restriction Agreements with the City. The apartment complexes are required to provide a certain percentage of rental units as workforce housing units as stipulated on the agreement.
 - As part of the implementation of the priority actions stated in the Next 10, the Mayor and City Council established a Taskforce in February 2018 responsible for conducting detailed research and analysis on available resources to be used to incentivize and promote the redevelopment of certain areas of the city in the north-end, as well as evaluating potential workforce housing policies. In January 2019, the Taskforce submitted a plan for the north-end revitalization, which included among other recommendations, "a variety of housing types and prices that maintains the diversity the North End already has and invites others to move there."

Section V.

Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

The City's Analysis of Impediments to Fair Housing (AI) report was adopted on March 2, 2010. The AI was submitted to HUD's Office of Fair Housing and Equal Opportunity (OFHEO) on March 3, 2010. The AI identified the following "General Recommendations for Promoting Fair Housing":

1. Establish a fair housing information website.
 - This task was completed and information can be found at the following links in English and Spanish on <http://spr.gs/cdbg1>

2. Highlight fair housing activities in Sandy Springs during National Fair Housing month every April.
 - The City recognized Fair Housing month through adoption of a resolution in 2014 and the CDBG Program 40th Anniversary, which has a Fair Housing component. The City also participates in the Atlanta Housing Task Force by periodically attending the meetings hosted by the ARC and DCA since 2016.
3. Explore partnerships with Sandy Springs Community Action Center (CAC) and Holy Spirit Catholic Church to ensure fair housing information is available for Hispanic/Latino residents.
 - In 2011, the City worked with the CAC to develop fair housing information for a brochure to be produced in 2012 (Exhibit C). The brochures were distributed to CAC and the City's seventy plus apartment complexes in August 2012 and in the summer of 2014. These brochures were updated in 2018 and distributed to CAC and the City's seventy plus apartment complexes, especially those located in the service area where the South Roswell Road Sidewalk Project is taken place in August 2018. Also, brochures advertising the fair housing trainings were distributed to the general public through property managers of apartments complexes, fliers were posted in open spaces, and fliers were given for distribution to other housing service providers.
4. As a part of annual apartment certification requirements, provided information to landlords on fair housing.

See recommendation #3 above.

5. Developed a fair housing outreach program for residents of Sandy Springs' rental properties for support if residents suspect they have experienced housing discrimination.
 - The City reached out to the CAC and Cred-Ability (formerly Consumer Credit Counseling Service) in 2015 to develop an annual joint event. Since then, no action has taken place. For the 2020 AI, the City will consider collaborating with Clearpoint), which is a financial counseling nonprofit organization in Atlanta to offer information on its services in Spanish and English on the City's website and Fair Housing Flyers.
6. Explore partnerships with Cred-Ability or other financial counseling agencies for outreach opportunities to Sandy Springs minority residents.
 - See recommendation #5 above.

7. Future Comprehensive Plan updates should analyze opportunities to directly incentivize the inclusion of mixed-income housing in future redevelopment projects consistent with Sandy Springs' policies.
 - The City adopted the Next 10 Comprehensive Plan in February 2017 and the new Development Code in August 2017. The Next Ten seeks to establish zoning to encourage workforce housing by adopting a workforce housing ordinance to incentivize the creation of new affordable workforce housing in new developments. Additionally, the 2017 Development Code provides incentives such as height bonuses for the creation of affordable units in new housing projects in specific zoning districts.
 - As part of the implementation of the priority actions stated in the Next 10, the City established a Taskforce in February 2018 responsible for conducting detailed research and analysis on available resources and tools to be used to incentivize and promote the redevelopment of certain areas of the city as well as evaluating potential workforce housing policies and strategies. In January 2019, the taskforce provided recommendation on potential plans for the North End of the City, which included among other recommendations "a variety of housing types and prices that maintains the diversity the North End already has and invites others to move there."
8. Complete an accessibility survey of available rental housing accessible to persons with disabilities in Sandy Springs to ensure compliance with fair housing law. Coordinate this recommendation with Sandy Springs ADA Coordinator
 - The City has not taken action on this recommendation at this time.

Section

Conclusions and Recommendations

Analyzing demographic, income and housing data presented in this AI, and drawing on the Community Assessment of the Sandy Springs Next Ten Comprehensive Plan as well, the following conditions may present impediments to fair housing choice in Sandy Springs:

1. **Potential of New Residents to be Aware of Fair Housing Laws.**

While an historic Act in the history of civil rights legislation, Fair Housing law has been in place for over 40 years, and most citizens have only a general familiarity with the law, the protections it affords and how to file a fair housing complaint if they feel they have experienced discrimination. Expanding the knowledge of fair housing law, how to identify discriminatory actions and how to file a complaint could be reasonable actions for Sandy Springs to take to promote fair housing.

Over the past decade the Sandy Springs minority population has grown considerably with the greatest increase seen in Hispanic/Latino residents. It would be safe to assume that all minority groups, especially those with potential language barriers, may be less informed concerning their rights under fair housing laws, as well as remedies available to those who may have experienced discrimination.

2. Lack of Available Land for New Development/Increased Redevelopment of Older, More Affordable Housing Stock with New, More Expensive Units.

Even though Sandy Springs has seen the redevelopment of two older apartment complexes, there still remains a significant stock of affordable apartment units within the City. The City will need to continue to monitor the availability of affordable units and ensure that redevelopment does not deplete the City's affordable housing stock.

3. Historical Disparities in Lending Across Racial and Ethnic Categories

As part of HMDA data reporting, the reasons for loan denials must be included. For the Atlanta-Sandy Springs-Marietta MSA, debt-to-income ratio, employment history and credit history, and collateral were the four most common reasons cited for non-conventional loan denials. Denial rates were the highest primarily for minority borrowers due to debt-to-income ratios and credit history. This data would support that minorities are more likely to be denied loans for reasons other than discrimination.

General Recommendations for Promoting Fair Housing

In response to the conditions described above, the list below represents some available options for furthering fair housing in Sandy Springs:

1. Continue to establish a fair housing information site using the Community Development Block Grant Program webpage. Make fair housing law, how to file a complaint and other information available on the website. References for locating Georgia Landlord/Tenant information could also be included.
2. Highlight fair housing activities in Sandy Springs during National Fair Housing by advertising on the City's website and newsletter educational and outreach activities hosted every April by the Atlanta Metro Fair Housing Services. Post on the City's website and newsletter information regarding Homebuyer Education Classes offered by Metro Fair Housing Services and DCA. (April is designated National Fair Housing Month each year by HUD.)
3. Preserve partnerships with Sandy Springs Community Action Center (CAC) to ensure fair housing information is available for Hispanic/Latino residents. Consider partnerships with other nonprofit and faith-based organizations that serve minority residents in Sandy Springs to promote fair housing.

4. Provide fair housing information to Landlords and Property Managers of apartment complexes when renewing business licenses.
5. Provide fair housing information for residents of Sandy Springs' rental properties on Fair Housing laws and agencies that are available for support if residents suspect they have experienced housing discrimination.
6. Host educational fair housing workshops on Fair Housing Laws once a year for housing providers and residents.
7. Partner with Clearpoint, or other financial counseling nonprofit organization, to offer information on its services in Spanish and English on the City's Fair Housing website and Fair Housing Flyers, since poor credit and other financial management issues have the greatest impact on minority loan denial rates according to HMDA data for the Atlanta-Sandy Springs-Roswell MSA.
8. Evaluate existing development projects that already have a mixed-income housing component to ensure compliance with adopted "Land Use Restriction Agreements." Assess potential opportunities for new development to use the City's incentives for Workforce Housing found in the Development Code.